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ABSTRACT

This report presents findings of a study to (1) describe state and local implementation of the 1976 Education Amendments and consequences of federally mandated vocational education policy and practice on vocational education activity, (2) understand ways in which state and local conditions affect policy implementation, and (3) recommend ways to achieve greater compliance with federal legislative intent. (Data were collected during onsite visits to state education agencies and selected local institutions in fifteen states during 1979-1980.) The introduction discusses the amendments and implementation and describes methodology. The next seven chapters address the legislation's two major themes. Under program improvement are chapters on planning, evaluation and data reporting, and coordination between CETA (Comprehensive Employment and Training Act) and vocational education. Two chapters concerned with equity focus on sex equity and special needs populations. These chapters summarize legislative history and the amendments' key provisions, describe implementation of the provisions in sample states, analyze reasons for the implementation patterns found, and present recommendations for improving compliance with federal intent through legislation or administrative action or discuss limits of federal intervention in vocational education. The chapter on funds distribution addresses issues cutting across the two themes. Chapter 8 presents a summary and conclusions. Sections on methodology and documents analysis are appended. (YLB)

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ABT ASSOCIATES INC.
55 WHEELER STREET, CAMBRIDGE, MASSACHUSETTS 02138
TELEPHONE • AREA 617-492-7100

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IMPLEMENTATION OF THE EDUCATION AMENDMENTS OF 1976:

A STUDY OF STATE AND LOCAL COMPLIANCE AND EVALUATION PRACTICES

Final Report

December 1980

by

Vernon L. Beuke
Carol VanDeusen Lukas
Nancy Brigham
Georgia S. Glick
John P. Breen

Prepared for:

The National Institute of Education
Washington, D.C.

Gerry Hendrickson, Project Officer

CE 028 580

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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Carol V. Lukas	Nancy Ames	Robert A Dentler
Contract Manager	Quality Control Reviewer	Management Reviewer

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CHAPTER 1

INTRODUCTION

This report presents the findings of a study conducted by Abt Associates as part of the Vocational Education Study sponsored by the National Institute of Education (NIE). NIE was directed by Congress in the Education Amendments of 1976 (P.L. 94-482) to conduct

> . . .a thorough evaluation and study of vocational education programs, including such programs conducted by the States; and such programs conducted under the Vocational Education Act of 1963, and other related programs conducted under the Comprehensive Employment and Training Act of 1973, and by the State Postsecondary Commissions authorized by the Education Amendments of 1972 (Section 523(b)).*

In response to this mandate, NIE designed and conducted a series of research projects on a wide range of issues in vocational education. NIE contracted with Abt Associates to undertake one of the major studies in the series, the Study of State and Local Compliance and Evaluation Practices in Vocational Education.** This study had three major objectives:

- to describe state and local implementation of the 1976 Education Amendments and the consequences of federally mandated vocational education policy and practice on state and local vocational education activity;
- to understand the ways in which state and local conditions affect the implementation of federal vocational education policy; and
- to recommend ways in which greater compliance with federal legislative intent can be achieved.

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*Throughout this report, references to the law and accompanying regulations are given in parentheses following the citation. Section numbers refer to the Vocational Education Act of 1963 as revised by Title II of the Education Amendments of 1976 (P.L. 94-482), and regulation numbers refer to the rules and regulations published by the Office of Education on October 3, 1977, in the Federal Register, Vol. 42, No. 191.

**Among the other studies commissioned by NIE, are a study of funds distribution conducted by the University of California at Berkeley, a study of special needs populations by A.L. Nellum and Associates; a study of consumer and homemaking education by CRC Education and Human Development, Inc.; a study of the effects of vocational education by The Huron Institute; and an analysis of the federal legal and regulatory framework in vocational education by the Lawyers' Committee for Civil Rights under Law.

The findings of the study are based on data collected through extensive on-site interviews during the 1979-1980 school year in 15 state departments of vocational education, 16 secondary education institutions, 12 post-secondary education institutions and 10 CETA prime sponsor organizations. The interview data were supplemented by an analysis of extensive documents in each of the 15 states visited and a more limited set of documents from 41 additional states and territories.

1.1 THE 1976 EDUCATION AMENDMENTS

In addressing the study objectives, the project focused on provisions related to two major themes of the 1976 Education Amendments--program improvement and educational equity.* One of the repeated criticisms of vocational education prior to the passage of the 1976 Amendments was that the programs it offered were duplicative, out-of-date and not responsive to current labor market needs. One source of difficulty, according to the testimony before the Congressional committees, was the lack of adequate state and local planning. The vocational education system was also criticized for not coordinating the planning between state boards of vocational education and state higher education agencies, and between either of these groups and the state employment and training agencies. Another source of difficulty was the lack of systematic evaluations and usable information on vocational education enrollments, placements and costs on which to base decisions about program needs and improvements.

To remedy these problems, and thus improve programs, Congress included among the 1976 Amendments a cluster of requirements to foster more rational planning and decision making in vocational education. Thus, there are new provisions which are intended to:

- make the planning process more broad-based;
- produce planning documents which are more than compliance documents;
- increase the availability and use of formal labor market data;
- give priority to programs which are new to an area and in new and emerging occupations;

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*The provisions of the 1976 Amendments are only discussed briefly here. Each chapter contains a more detailed presentation of the provisions related to that topic and an analysis of the legislative history of those provisions.

- produce reliable, standardized data on vocational education enrollments, staffing patterns, and costs;
- increase the use of formal program evaluations; and
- increase coordination among different organizations providing vocational education and training.

We have organized the examination of these provisions into chapters on planning, evaluation and data reporting, and coordination between vocational education and CETA.

The 1976 Amendments also increase the emphasis on achieving equity in vocational education. Since the passage of the Vocational Education Act (VEA) of 1963, Congress has mandated that vocational education respond to the needs of students who have academic, socioeconomic, and other handicaps which prevent them from succeeding in a regular program of vocational education. The original mandate was a broad directive that vocational educators increase their efforts to provide access to these students. In 1968, however, Congress decided that this broad emphasis had not resulted in adequate services to special needs populations. It therefore extended the federal requirements to target certain portions of Vocational Education Act grants to handicapped and disadvantaged students. The requirements included matching provisions since the federal assistance was intended as a catalyst to state and local spending. By 1976, Congress was still dissatisfied with the attention being given to these populations and particularly with the low level of state and local funds being used for these purposes. In addition, Congress felt that vocational educators were not serving well students of limited English-speaking ability.

In preparing the 1976 Amendments, Congress also heard criticisms that sex bias and sex stereotyping were significant problems in vocational education. One major complaint was that although women traditionally have enrolled in vocational education, they tend to be clustered in a narrow range of occupations, generally in the lower paying positions.

To address these criticisms, the 1976 Amendments continue to expand the emphasis on equity in vocational education by:

- maintaining the requirement that a specified proportion of VEA funds be reserved for services to handicapped and disadvantaged students;

- mandating for the first time that a portion of the funds reserved for services to disadvantaged students be spent for services to limited English-speaking students; the portion is to be determined by the incidence in the states' population between the ages of 15 and 24;
- including requirements that the set-aside funds must be matched separately from the overall state and local match and that set-aside funds could only be applied to the costs of additional services for the handicapped and disadvantaged students, not the full costs of the vocational program;
- giving priority to distributing funds to economically depressed areas and areas with high rates of unemployment; and
- including for the first time provisions to reduce sex bias and sex stereotyping by mandating that the state vocational education agency hire full-time personnel to address these problems and by allowing federal funds to be used to support sex equity.

We have divided our examination of these equity provisions into two chapters: one on sex equity and one on special needs populations including the handicapped, disadvantaged, and limited English-speaking. We give these groups separate treatment for two reasons: (1) the sex equity provisions are new, and the elimination of sex bias and sex stereotyping is listed as one of four major purposes of the 1976 legislation and (2) the mandate to appoint full-time state personnel with specified functions represents a significantly different approach to dealing with equity issues in vocational education than the targetting of funds approach used for the other populations.

In addition to including specific provisions to strengthen the emphasis on program improvement and on equity, the 1976 Amendments restructure the Vocational Education Act and prescribe new procedures for distributing VEA funds within states. While it was beyond the scope of our study to analyze the impact of the funds distribution requirements on individual districts, we did gain some insights on limited aspects of the funding provisions. These are presented throughout the report, as well as in a separate chapter on funds distribution. Since the structure of the Act and the funding requirements are critical to an understanding of all issues in the report, we summarize them here.

Under the 1976 Amendments, the Vocational Education Act is divided into two parts: Part A governs grants to the states and Part B is the Commissioner of Education's discretionary program of grants and contracts.* Funds in Part A of the Act are allocated to states, as before, on the basis of population stratified by age and multiplied by the ratio of national to individual state median income. Each state is then responsible for administering these funds within a complicated set of guidelines which govern their use and the process by which they are distributed.

The state grants are divided into four subparts:

- Subpart 2: Basic Grant
- Subpart 3: Program Improvement and Supportive Services
- Subpart 4: Special Programs for the Disadvantaged
- Subpart 5: Consumer and Homemaking Education

Subparts 4 and 5 continue the separate funding of two program areas which were separate under earlier laws. Subparts 2 and 3, however, represent the consolidation of seven previously separate subparts. The consolidation was intended to increase states' flexibility in using the federal funds to best respond to changing labor market needs and local priorities.

Subparts 2 and 3 together make up the states' basic allocation. Subpart 2, which must equal 80 percent of the basic allocation, is to be used for a variety of program purposes including, among others:

- support of full-time personnel to eliminate sex bias and sex stereotyping in vocational education;
- vocational education programs for displaced homemakers and other specially designated groups;
- vocational education programs;
- work-study programs;
- cooperative vocational education programs;
- energy education;
- construction of area vocational schools;
- provision of stipends for students in acute economic need;
- placement services;
- support services for women;
- day care for children of students; and
- state and local administration.

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*Part B is not analyzed in this study.

Subpart 3, which is to equal the remaining 20 percent of the basic allocation, is to be used for program improvement and supportive services including:

- research;
- exemplary and innovative programs;
- curriculum development programs;
- vocational guidance and counseling;
- vocational education personnel training; and
- grants to overcome sex bias and sex stereotyping.

The law further requires that at least 20 percent of the Subpart 3 funds are to be used for vocational counseling and guidance. In addition, the law for the first time sets limits on the use of VEA funds for state and local administration. With limited exceptions, federal dollars are to be matched one-for-one with state and local dollars.

In addition to specifying allowable programmatic uses of federal vocational educational funds, the 1976 Amendments continue to set aside funds from the states' basic allocations for special population groups, as mentioned earlier. From Subpart 2 and 3 funds, States are required to spend:

- 20 percent for special services for disadvantaged students;
- a portion of the disadvantaged set aside for services to students with limited proficiency in English, the portion to be equivalent to the proportion of limited English-proficient students age 15 to 24 in the total population of the state in the same age bracket;
- 10 percent for special services for handicapped students;
- 15 percent for postsecondary and adult programs; and

The Amendments also specify new criteria for distributing federal funds among local educational institutions and other eligible recipients. Priority must be given to applicants which:

- are located in economically depressed areas and areas with high rates of unemployment and are unable to provide the resources necessary to meet their vocational education needs without federal assistance;
- propose programs which are new to the area, and which are designed to meet new and emerging manpower needs and job opportunities.

In determining the amount of funding to be given to each of the approved applicants, the state must use as the two most important factors, in the case of local education agencies:

- the relative financial ability of the agency to provide the resources necessary to meet the vocational educational needs in its area; and
- the relative number or concentration of low-income families or individuals in the area.

Thus, the findings of the study reported here address the provisions of the 1976 Amendments related to program improvement, educational equity, and, to a limited extent, the distribution of federal funds.

1.2 IMPLEMENTATION OF THE LAW

One key factor in understanding the extent and nature of the implementation of the 1976 Amendments is the recognition that it is taking place in a complex, multilayered delivery system. Figure 1.1 shows the steps involved in translating Congressional intent to the delivery of vocational education at the local level. After Congress translates its goals into provisions in the law, federal administrators--when authorized by Congress--write administrative regulations to govern the implementation of the law. The state vocational education agency then is responsible for implementing some of the regulations itself and overseeing the local implementation of others. The final link in the process is the local education agency, which as in most educational programs is the key to the process, since it is the point of actual service delivery. In the course of this translation process, many features of the process and the system in which it occurs work against the faithful implementation of legislative intent.*

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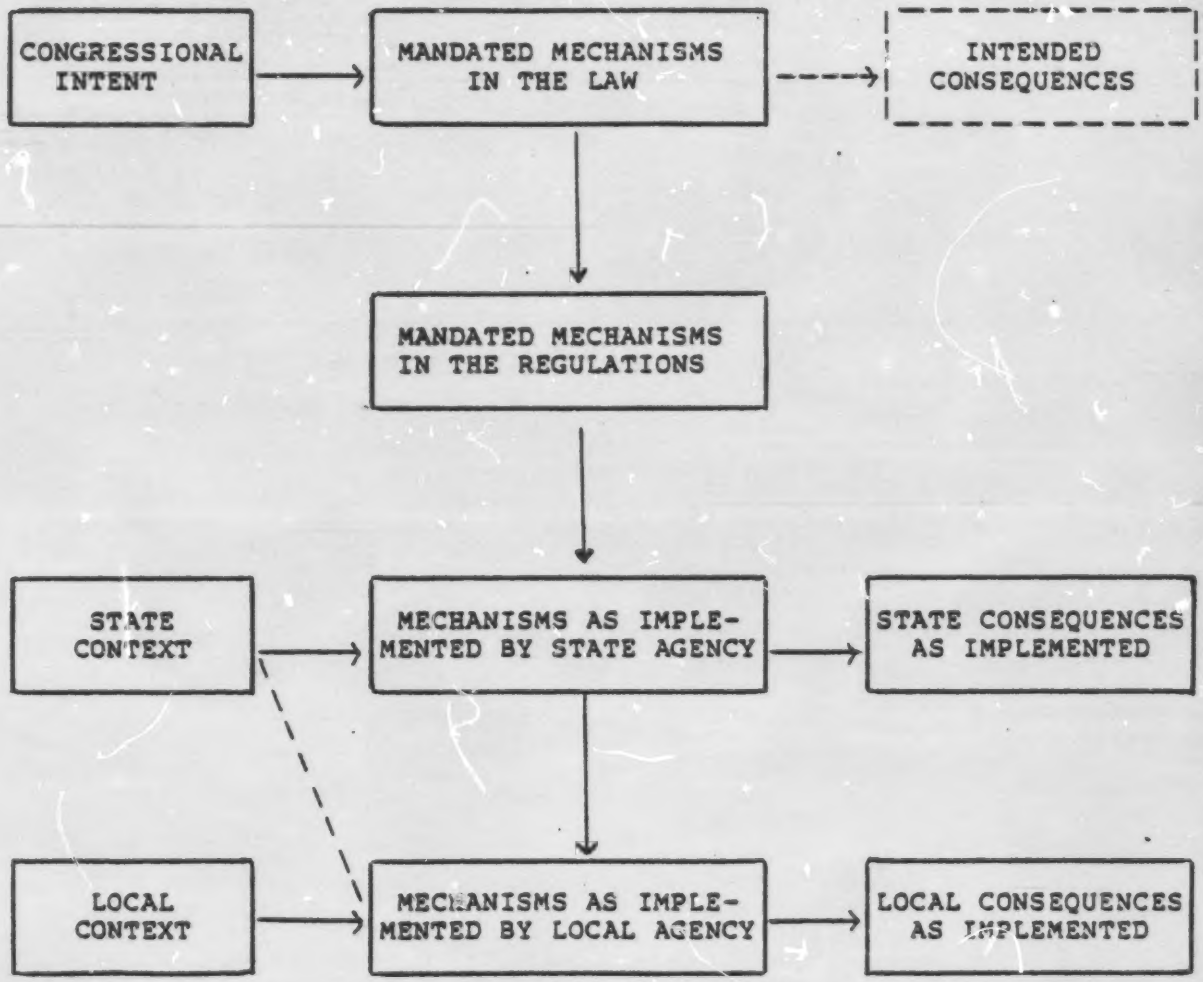
*The view of the implementation process outlined here is based not only on our findings in this study but more broadly on the growing literature on the complexities of policy implementation. For more detailed discussions of these concepts, see for example, Richard F. Elmore, Complexity and Control: What Legislators and Administrators Can Do About Implementing Public Policy (Washington, D.C.: U.S. Department of Education, 1980); Eugene Bardach, The Implementation Game (Cambridge, MA: MIT Press, 1977); Jeffrey Pressman and Aaron Wildavsky, Implementation (Berkeley, CA: University of California Press, 1973).

Figure 1.1

THE TRANSLATION OF CONGRESSIONAL INTENT TO PRACTICE



At a minimum, the implementation process takes time. The steps shown in Figure 1.1 involve multiple organizations and multiple actors within each organization. At each step, the multiple participants must study the law (and other regulations and policies passed down from the level above) in order to determine what action is required. Then they must make the decisions and develop the plans to carry out these actions. At the federal level, for example, the Bureau of Occupational and Adult Education (BOAE)* translated the 1976 Amendments into administrative regulations. The regulations were drafted, submitted for public comment, revised and then formally issued on October 3, 1977. Since then, BOAE has continued to issue interpretations and policies to guide implementation.

In most cases, the implementation process is not simply a function of time, however, but is complicated by a variety of factors which potentially increase the gap between legislative intent and educational and administrative practice. Three categories of factors which affected the implementation of the 1976 Amendments in our sample states were:

- the lack of clarity of certain provisions of the law;
- competing goals and priorities within the state and local agencies implementing the law;
- differing levels of resources and expertise available to carry out the law.

With any law or policy, there is room for a degree of interpretation by any of the participants in the implementation process. To the extent that some aspects of the law are ambiguous or unclear, the latitude for interpretation increases and with it the probability that the law as implemented will vary among agencies implementing it. As we shall see in the chapters that follow, some provisions of the 1976 Amendments are unclear--for example in the provisions governing the distribution of federal funds. This lack of clarity has contributed to the variable implementation of these provisions and in some cases has resulted in practices which may be inconsistent with Congressional intent.

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*With the creation of the Department of Education, BOAE was retitled to become the Office of Vocational and Adult Education, or OVAE. Since the major portion of our research was conducted before this change, we refer to BOAE throughout the report except when making policy recommendations. In that context, we use the term OVAE.

Any law or policy is also implemented in a context. In the case of the 1976 Amendments, the state and local contexts are education agencies: ongoing organizations which exist for purposes other than the implementation of the federal law. They have goals and statutory requirements independent of the federal requirements. They also have independent political constraints and pressures from a variety of constituencies. To the extent that federal goals conflict with the state and local agencies' own goals or that competing state and local priorities take precedence over federal goals and priorities, the federal law may not be implemented as intended. In times of tight fiscal resources, for example, local school boards may choose to support basic academic programs rather than expand vocational education into new program areas or devote additional resources to special services for handicaped and disadvantaged students in vocational education.

Another feature of the context in which a law is implemented is the availability of resources and expertise in the state and local agencies. Even if state and local agencies are in agreement with federal goals, they may not have the staff or the funds to carry them out. Or they may lack the technical expertise needed to meet the requirements.

Conversely, the presence of resources and expertise, often in the form of existing practices which conform to the requirements of the law, not surprisingly make the law easier to implement. Stated slightly differently, the extent to which a law is implemented within a short time after its passage is frequently a function of an agency's readiness or starting point: those agencies which are more advanced in their implementation at a given point were often already doing something similar to what is required by the new law when the law was passed. For example, in our study, those states which had a management information system for vocational enrollments and costs in place before the passage of the 1976 Amendments have, in general, been more successful in meeting VEDS requirements than states without an existing information system.

In addition to these general features of the implementation process, the implementation of the 1976 Amendments was also influenced by specific features of the vocational education system. Most notably, the system is diverse, loosely-coupled and bottom-heavy.

The diversity of the vocational education enterprise exists on many dimensions of organization and operations.* At the state level, the vocational education system differs among states in:

- the structure and authority of the governing board which is designated to serve as the state board for vocational education;
- the provisions for the coordination of activities among the various state agencies having administrative responsibilities for vocational education;
- the characteristics of the agencies responsible for state board policy and the location of these agencies within each state's governance system; and
- the relationship between the state agencies responsible for the governance and the institutions in which vocational education is provided.

For federal purposes, each state receiving funds under the Vocational Education Act is required to designate a state board to be responsible for the administration of the programs under the Act. The structure and authority of these boards varies greatly as indicated by the identification in the Westat study of four types and three subtypes of state boards of vocational education.** While in the majority of states, policy for vocational education is established by the board of education which governs all levels of education, some states have separate boards of vocational education by itself or combined with community colleges.

Not only is there diversity among states in the type of board which is designated as the state agency, but in many states the structure is further complicated by the fact that the designated state board is not the only policy body governing vocational education. In some states for example, secondary vocational education is governed by the state board of education while postsecondary vocational education is governed by a board of higher education. Where there are multiple policy boards, there are sometimes

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*This brief discussion of the diversity of vocational education draws heavily on the findings of the National Study of Vocational Education Systems and Facilities directed by Alan Woodruff and published by Westat, Inc. and Institutional Development Associates, Inc. in October 1978. The study is frequently referred to as the Westat study.

**Westat, p. 11.

formal mechanisms for coordination such as members of one board serving as ex officio members of another or legislatively-mandated coordinating committees. In states without formal mechanisms, coordination relies on administrative committees or personal interaction among board members.

Even in those states which have a single governing body, there is frequently variation in the number of administrative agencies responsible for vocational education. Many states have separate agencies administering secondary and postsecondary education, and in some instances have little communication between them. The administrative agencies for vocational education also vary in their location within the state hierarchy and in their internal structure. Every state has one person designated as state director of vocational education, but the specific title that person has in the state bureaucracy and his or her own status among other administrators in the state varies. Within the state agencies, states vary in the number of staff members and in the structure of the agency. Most states share broad features of having some staff who are organized traditionally by vocational discipline and others who are organized by function such as management information systems or planning or evaluation but more detailed structures, areas of responsibility/job definitions, clustering of functions, and relations between them vary.

States also vary in the type of authority the state vocational education agencies have over the local vocational education institutions. In some cases, particularly at the postsecondary level, the state has direct authority over local vocational program, usually because they are fully state funded. At the other extreme, programs are in many cases independently administered by the local agency under policies established by the state.

Similarly, at local level, vocational education is delivered in diverse settings. At the secondary level, in addition to demographic features on which all schools vary, such as school size or population density of school district, local education agencies also vary specifically around delivery system for vocational education: some districts have vocational programs within the comprehensive high schools, others have separate regional technical schools which are vocationally oriented but also offer academic courses--i.e., students attend full time--and other districts have shared-time schools, where vocational schools provide only vocational courses and students split their school day between these centers and the home high school where they take their nonvocational courses. Similarly, at the

postsecondary level, vocational education may be provided in a community college, a technical institute which serves only postsecondary students, or a vocational school which also serves secondary students.

Such diversity at the state and local levels may affect the implementation of the Vocational Education Act in three ways: first, the law may be put into practice in such different settings and thus in different forms that implementation is so variable that it is hard to determine which practices comply with the law and which do not; second, if the federal government tries to force state and local agencies into a common mold, it may make inappropriate demands on those agencies and thus inadvertently work counter to the intent of the legislation; third, the local diversity increases the difficulty of the state management of federal requirements.

Another characteristic of the vocational education enterprise that influences the way the federal law is carried out is that it is loosely coupled and bottom-heavy. The system is loosely coupled in that one level of the bureaucracy typically has only limited control over the level below it. For example in some states, as mentioned earlier, the state vocational education agency sets policies for local programs but has no direct administrative control over them. Such loose coupling affects the implementation of a federal law in that it restricts the degree to which changes initiated at the top of the system result in the intended changes in other parts. The system is bottom-heavy in that the factors which have the greatest impact on a vocational program's success or failure are at the bottom of the organizational hierarchy, in this case at the local educational institution.

Another way to state this notion is in terms of local autonomy: vocational education programs are generally locally directed and administered. School systems typically accept only limited control by the state agency, whether the state agency is acting in its own behalf or as an agent of the federal government. The emphasis on local control is heightened in vocational education by the fact that federal and, in most cases, state dollars contribute only a small portion of the cost of vocational education. Thus, the political stance of local autonomy buttressed with the preponderance of support for vocational programs coming from local dollars means that most decisions about what courses are offered and what curricula are used are made locally. This set of characteristics of the vocational education enterprise runs counter to an assumption which seems to underlie many of the planning,

coordination, and evaluation requirements in the 1976 Amendments; namely, that the state agency controls and directs all vocational programs in the state and thus can meaningfully develop a comprehensive statewide plan for vocational education.

1.3 METHODOLOGY

The analyses in the study are based primarily on on-site interviews conducted during the 1979-80 school year in 15 state departments of vocational education, 16 secondary institutions, and 12 postsecondary institutions. The interview data are supplemented by an analysis of documents collected in each of the 15 state visits and a more limited analysis of documents from 41 additional states and territories.

The states in the sample were selected to maximize variation on a variety of dimensions including geographic region, population size and characteristics, and vocational education governance structure. The secondary and postsecondary institutions were selected to maximize variation across the total sample on type of institution and population density of the district. For each state, the categories of institutions to be studied were selected purposively and the particular institutions to be visited were drawn randomly from those categories.

Each state was visited twice. The first visit was made during the summer of 1979 to the state vocational education agency to explain the study, conduct preliminary interviews, and obtain written materials on the topics being studied. The second visit was made during the 1979-80 school year. At least two project staff members interviewed state-level officials during the first three days of the site visit. In those states where local institutions were also studied, the project staff spent at least two additional days interviewing secondary, postsecondary, and CETA staff in one geographic area.

At the state level, we interviewed state vocational education agency staff, state board and state advisory council members, and officials of other agencies including the Governor's Manpower Office (CETA), the State Occupational Information Coordinating Committee, and special education. In each state, we talked with between 7 and 30 state officials depending on the size of the state and the structure of the state government.

At the local level, we talked with vocational educational administrators, board of education and advisory council members, special education staff and staff of the CETA Prime Sponsor. In addition, in most places we talked with superintendents, principals, and vocational education instructors. As at the state level, the number of local respondents varied between 5 and 25 depending on the size and structure of the district.

All interviews were semi-structured. Each field team was required to collect information on a standard set of topics in each site, but the specific questions asked of each respondent were left to the discretion of the interviewer because of the diversity of state and local delivery systems in the sample. In order to protect the confidentiality of our respondents, states or local institutions are identified individually in the chapters that follow only when the data are taken directly from public documents such as State Plans, BOAE Statistical Reports, or State Advisory Council Reports.

A more detailed description of the study's methodology can be found in Appendix A.

1.4 ORGANIZATION OF THE REPORT

The remainder of the report is organized into seven chapters which address the two major themes of the legislation. Under the theme of program improvement, there are chapters on planning, evaluation and data reporting, and coordination between CETA and vocational education. These are followed by two chapters concerned with equity--one on sex equity and the other on special needs populations (including the handicapped, disadvantaged, and limited English-speaking). The chapter on funds distribution addresses issues which cut across the two themes, as does the final chapter which presents an overall summary and conclusions.

Each chapter--except the summary and conclusions--begins with a summary of the legislative history and the key provisions of the 1976 Education Amendments in that area. Each then describes how those provisions have been implemented in the 15 sample states and analyzes the reasons for the pattern of implementation found. Finally, each paper presents recommendations, where appropriate, for improving compliance with federal intent through legislation or administrative action or, in some cases, discusses the limits of federal intervention in vocational education.

CHAPTER 2

PLANNING

2.1 INTRODUCTION

In 1975, the Government Accounting Office (GAO) reported to the House Subcommittee on Elementary, Secondary and Vocational Education the results of their seven-state study of vocational education.* GAO found much to criticize in the status of the vocational education enterprise. A major target of criticism was vocational education planning at national, state, and local levels. Among the specifics addressed by GAO were that: annual state plans were no more than compliance documents; coordination among the organizational entities providing vocational services was minimal (and cooperation even less); data which would be helpful in planning were unavailable, inadequate, or unused; changing manpower needs were not addressed; current labor needs were neither fully nor realistically assessed; state and local advisory councils were largely uninvolved in the planning process; and local-level planning was neither comprehensive nor coordinated.

The frustration felt by the House Committee at the GAO findings was expressed by one member who stated: ". . . [Y]our report indicates to me that we are back in 1967 . . . that many of the things we sought to cure by the 1968 Act have not been cured." If the curative approach to the ills of vocational education was true of the 1968 Act, it was even more true of the 1976 Amendments. The Congressional sentiment appears to have been that vocational education was "sick" and that the legislative amendments represented steps to cure it. In that light, the 1976 prescription was "more of the same" both in planning and in other areas of Congressional concern regarding vocational education.

The planning prescription which runs through both the House and Senate Committee reports contains two major ingredients: (1) the need for a broad-based planning process dependent on the use of the best available labor market information, and (2) the importance of producing state planning documents as

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*Comptroller General of the United States, Report to the Congress, "What is the Role of Federal Assistance for Vocational Education?" (Washington, D.C.: December 31, 1974).

aid to and proof of good planning. The legislative requirements contained in the 1976 Education Amendments provide a series of mechanisms designed to assure that the planning model implemented by the states would be built around these three elements: a rational process, relevant labor market data, and useful documentation.

Figure 2.1 displays the GAO findings concerning planning problems; the legislative requirements intended to address these problems; and the outcomes of the requirements considered desirable by Congress. While the figure displays the requirements according to the problem areas identified by GAO, the requirements may be grouped somewhat differently as process requirements, relevance requirements, and documents requirements. The discussion in this chapter is organized around these three groupings.

All the requirements as they appear in the regulations (104.161 through 104.188) are devoted to the design and production of the state five-year plan. Congress apparently believed (or sought to mandate) that the process by which the plan was prepared and the process by which funds and responsibilities were allocated would be one and the same. We have found a different reality, however.

2.2 STATE PLANNING PROCESS REQUIREMENTS

One of the strongest beliefs stated by the Congressional committees was that the involvement of the broadest possible variety of participants would improve coordination of planning by making it more inclusive of and accountable to a variety of interests. To assure the participation of the groups considered important by Congress, the Act spells out who these groups are and how they are to take part in the planning process (see Figure 2.2).

The state board is the pivot around which the process revolves. The 107 Committee, unnamed in the legislation and commonly called after the section of the Act which created it, is the central mechanism for assuring input from other state agencies. Other groups--most importantly each state's advisory council--play somewhat more peripheral roles. The following sections discuss each of the important participants in terms of Congressional intent; the way each part of the process has been implemented in the sample states;

Figure 2.1

SUMMARY OF GOVERNMENT ACCOUNTING OFFICE
FINDINGS AND LEGISLATIVE REQUIREMENTS FOR STATE PLANNING

PROBLEM AREA	GAO FINDING	LEGISLATIVE REQUIREMENTS	EXPECTED OUTCOME
Coordination of Planning	coordination among delivery agencies is minimal	all the planning process and coordination with CETA requirements	• solution to overlapping and duplicating programs (Senate) • that the needs of all people within the state will be better served by this • broad consultation in deciding how to spend federal funds and that vocational education programs will eventually emerge as a much stronger, more realistic program (House, p. 57)
Relevance of Planning to Labor Market	labor market needs not fully understood nor realistically assessed; little assurance that changing manpower needs are being addressed; data helpful in planning are unavailable, inadequate or unused.	data requirements VEDS SOICC new program emphasis	• increase relevance of vocational education programs to manpower demands
State and Local Plans	reflect compliance rather than planning, not used to provide direction to programs or to measure program impact (p. 5)	documents requirements	• plan should reflect "state assessment of its needs for vocational education taking into account populations to be served, job markets to be met, regional distribution and special needs" (Senate 47) • cut substantially unnecessary paper flow Annual plan: only the most streamlined document, rule of reason specifically by state to describe intended use of federal funds (Senate) Account: more emphasis on reasons for choosing their uses of federal funds

Figure 2.1 (Cont.)

SUMMARY OF GOVERNMENT ACCOUNTING OFFICE
FINDINGS AND LEGISLATIVE REQUIREMENTS FOR STATE PLANNING

PROBLEM AREA	GAO FINDING	LEGISLATIVE REQUIREMENTS	EXPECTED OUTCOME
State and Local Advisory Councils	have limited impact; not integrated into planning process	SACVE LACVE 107 Committee	• role of SACVE to advise in the planning process intent is that advice be given serious consideration (Senate) • intent of local advisory councils to strengthen the ability of local agencies to focus their efforts on the greatest needs (House)
Local Planning	comprehensive planning; though most essential at the local level, often was absent	program applications LACVE	• applications supposed to give the state board information necessary to make hard choices among competing applications for some federal funds

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Figure 2.2

PARTICIPANTS IN PLANNING

PARTICIPANT	MECHANISM FOR INVOLVEMENT
Sole state agency for vocational education	Overall responsibility for the process; "pivot" of mandated planning activities
State agency responsible for secondary vocational education	Represented on 107 Committee
State agency responsible for postsecondary vocational education	Represented on 107 Committee
State agency responsible for community and junior colleges*	Represented on 107 Committee
State agency responsible for higher education*	Represented on 107 Committee
Representative of local school boards or committees	Represented on 107 Committee
Representative of vocational education teachers	Represented on 107 Committee
Representative of local school administrators	Represented on 107 Committee
State Manpower Services Council (now the SETC)	Represented on 107 Committee; review and sign-off on plan
State agency* or commission responsible for comprehensive planning in postsecondary education (including private nonprofit and proprietary programs)	Represented on 107 Committee
State Advisory Council on Vocational Education	Overall assistance in planning process; represented on 107 Committee; review and sign-off on plan
Sex equity coordinator	Review and sign-off on plan
General public	Public hearings on plan

*If such separate agencies exist in the state.

and those factors which appear to influence the implementation process.*

2.2.1 The State Board

Congress was generally satisfied with the effectiveness of the sole state agency (state board) requirements which it had enacted in the 1968 legislation. The House committee's report comments that "the Sole State Agency requirement has worked well in giving cohesiveness and an overall sense of purpose to the administration of the program at the state level" (p. 27). Nevertheless, Congress heard repeated testimony that in the majority of states, the designated agencies were oriented to the secondary level of vocational education, and postsecondary and higher education were often relegated to the status of poor relations. Thus, in mandating new process requirements Congress sought to assure input from other state agencies involved in providing vocational education in the state, but at the same time retain the cohesion of single agency control and continue the centralization of responsibility.

To accomplish this cohesion, Congress gave responsibility to the state board for orchestrating the entire planning process and also gave authority to the board over the input of all other participants. Specifically, Congress assigned the state boards to:

- create and convene a 107 Committee;
- conduct the public hearings;
- allow opportunity for review by representatives of certain interest groups whose concerns Congress wished to be addressed.

Final decisions about the state plan, as we shall see, are made by the state board.

In all the sample states, these responsibilities were conducted as mandated and all elements of the legislation had been implemented. 107 Committees were in place and meetings have been convened as required. Public hearings have been held and review and reaction opportunities have been provided. In other words, the mechanisms for compliance with Congressional intent have been established and are functioning.

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*The discussion of implementation of the state board role is here limited to those activities carried on by the state board in direct connection with the mandated planning process. Planning activities devoted to funding decisions are discussed in a separate section (Chapter 7) on funds distribution.

Based on the testimony made before Congressional committees, a critical factor affecting the state board's role and activities is its orientation to secondary or postsecondary vocational education. The legislation appears based on the assumption that the agency's orientation is likely at the secondary level; to achieve better coordination, postsecondary and higher education representatives must be brought into the process. Figure 2.3 lists the 15 sample states by governance type and demonstrates the secondary-level orientation of the majority of states. The majority of the sample states display a secondary orientation, indicating that the 107 Committee structure fits the existing situation.

2.2.2 The 107 Committee

Congress created of this committee to improve the coordination of vocational education planning among the major agencies involved with vocational programs. The 107 Committee was constructed to prevent domination of the process by the sole state agency, which is heavily dominated by secondary vocational education interests to the neglect of postsecondary and higher education agencies. To counteract this phenomenon, the 107 Committee reserves up to four slots (out of a possible ten positions) for postsecondary and higher education. CETA, another major coordination concern of Congress, is represented by the State Employment and Training Council (SETC); the consumers of vocational education are represented by a State Advisory Council on Vocational Education (SACVE) member. Finally, there are representatives of vocational teachers, administrators, and local school boards.

Congress understood that states were characterized by differing governance structures and did not intend 107 Committees to have closed memberships. In fact, Congress encouraged states to include more members if they seemed appropriate. The Senate report says that what the 107 Committee seeks is honest representation of whatever agencies a state itself has decided to create as part of its own governance structure, and encourages states to appoint any other members at their discretion to assure the "widest possible participation" (p. 4774).

Table 2.1 and Figure 2.4 show the size and composition of the 107 Committees for 11 of the sample states. In preparation of the five-year plans, these states convened committees which ranged from 5 to 24 members; for the

Figure 2.3

CLASSIFICATION OF SAMPLE STATES BY GOVERNANCE STRUCTURE TYPE*

Type A: States with one agency for all levels of education, n = 6

Florida
New York
Pennsylvania

Type B: States with an agency for elementary and secondary schools, including vocational education and a state coordinating or governing agency for higher education, n = 31

Alabama
California
Illinois
New Hampshire
Oregon
Texas

Type C: States with an agency for elementary and secondary schools, an agency for vocational education, and a state coordinating or governing agency for higher education, n = 8

Colorado
Indiana
Kentucky
Oklahoma
Wisconsin

Type D: States with an agency for elementary and secondary schools, including vocational education and governing boards for individual institutions of higher education with no statewide governing agency, n = 3

New Mexico

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*Gentry, Don K., "Federal and State Governance of Vocational Education: Its Relation to Compliance with Federal Rules and Regulations," 1978.

Table 2.1

107 COMMITTEE MEMBERSHIP, FIVE-YEAR AND 1979 ANNUAL PLAN

STATE	NUMBER OF MEMBERS FIVE-YEAR PLAN	NUMBER OF MEMBERS 1979 PLAN	NUMBER AND PERCENTAGE OF "NEW MEMBERS" IN 1979	
Alabama	10	9	8	89%
California	16	14	6	42%
Colorado	10	10	2	20%
Illinois	7	7	4	57%
Indiana	14	14	2	14%
Kentucky	11	10	3	30%
New York	5	5	1	20%
Oklahoma	7	8	4	50%
Oregon	10	10	3	30%
Texas	24	9	4	44%
Wisconsin	6	6	0	0%

Figure 2.4

197 COMMITTEE TYPES OF MEMBERSHIP

NUMBER OF STATE MEMBERS, FIVE-YEAR ( ) AND 1979 PLAN [ ]		MULTIPLE REPRESENTATIVES OF ONE MANDATED CATEGORY	ONE REPRESENTATIVE OF MULTIPLE MANDATED CATEGORIES	UNMANDATED REPRESENTATION	CHANGE IN 1979 ANNUAL P
Alabama	(10) [9]	2 SACVE representatives	Postsecondary and community colleges	State board (1)	-1 SACVE representative
California	(16) [14]	4 community college representatives	None	Skills and business Students (4) (unspecified)	-2 community college; +2 higher education; +1 local administrator; -4 unmandated represent
Colorado	(10) [10]	2 local administrators	None	Ex-officio members Vocational Rehabilitation Commission on Women	None
Illinois	(7) [7]	None	None	None	None
Indiana	(14) [14]	3 representatives of higher education	None	Vocational/technical education: agriculture, labor, and business	None
Kentucky	(11) [10]	2 local school board representatives	None	None	-1 local school board r
New York	(5) [5]	None	None	None	None
Oklahoma	(7) [8]		Secondary/ postsecondary		+1 community college re sentative
Oregon	(10) [10]	2 representatives of vocational education teachers (secondary and postsecondary); and 3 representatives of local administrators (secondary, postsecondary, and community colleges)	None	Ad-hoc members - Community colleges; Guidance services; Equal education opportunity (i.e., sex equity coordinator)	None
Texas	(24) [9]	None	None	General education; Special education; Statewide planning and assessment; Administration of vocational program; Adult services; Vocational support services; Vocational administrative services; Exemplary programs; Research projects; Planning and evaluation; Vocational education professional personnel; Vocational education guidance services; Vocational education curriculum development; Vocational educatio equal access	-14 unmandated repres Community college/high cation reduced to 1 me representing both; -1 remaining who repre remaining who represer community colleges and higher education
Wisconsin	(6) [6]	None	None	None	None

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preparation of the 1979 annual plan, the changes were generally slight, but the largest of the 107 Committees was reduced from 24 members to 9. Columns three and four of this table are particularly interesting, since they speak to an issue frequently raised by vocational administrators--turnover in 107 Committee membership. We were told that a major hindrance to the usefulness of the 107 Committees was the high degree of turnover and the need to orient new members each year. While some states did show a good deal of turnover in committee membership, 6 of the 11 on which we have data had 30 percent or less new members from one year to the next.

The composition of the committees shows variety in several ways (see Figure 2.4). Six states appointed multiple representatives of one mandated category; four appointed unmandated representatives; and two added ad hoc (non-voting representatives). Three states chose to have one member represent more than one mandated category--a practice specifically allowed by the regulations. In 1979, multiple representation was less common although, in general, committee composition was stable.

An important issue in understanding the functions and the various types of composition of 107 Committee membership is that of voting membership. The regulations concerning the 107 Committee give as one of its responsibilities to "recommend for adoption" the state plan; i.e., vote to approve it. The required certification which appears in the state plan, however, (which contains the signature of each 107 Committee member) does not attest to his/her approval but that the opportunity for involvement in the planning process has been afforded to the committee members. While a majority is needed to approve the plan, not all members must agree to its provisions.* Thus, the actual vote may be a simple majority of committee members giving their approval.

One member of a 107 Committee with whom we spoke felt that this difference had not been made clear to the members at the beginning; furthermore, his signature represented a de facto approval of a plan he vehemently disagreed with. Thus, he refused his signature. The state agency resolved this matter by obtaining a letter from the committee chairman stating that the representative had been present at meetings and had, indeed, participated. This

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*Should a majority fail to vote to recommend the plan, the state board retains the authority to submit the plan, stating that it was not recommended by the 107 Committee.

letter was notarized and forwarded as part of the five-year plan in place of the member's signature.

A major factor affecting the role played by the various 107 Committees is whether a forum for secondary/postsecondary coordination was in place before the committee was created--in other words, the extent to which the committee was redundant with existing mechanisms. In those three sample states which have state agencies with "cradle to grave" responsibilities, the opportunity for coordinated planning across all levels of vocational education already exists. Of the remaining 12 states, four already had in place planning/coordinating committees which the 107 Committee either replaced or attempted to coexist with. Vocational administrators felt that in the four states with pre-existing coordination committees, the old structures contributed more to coordination than the new 107 Committee.

Another factor which proved restrictive to the Committee was the interpretation of its membership requirements as the law was translated into the regulations and the regulations were interpreted by the states. The five-year plan, prepared before the regulations were issued (see Figure 2.4) showed 107 Committees which, apparently in accord with the intent of the Act, contained both multiple representation of one mandated category and additional members beyond the mandatory categories. When the final regulations were promulgated in the Federal Register on October 3, 1977, however, a slightly different construction of Congressional intent appeared in the comments and responses section (p. 53872). The two comments and responses of particular interest appear below:

> 104.162 Number of Representatives on the Planning Group.
>
> Comment. Two commenters raised the question of whether it would be appropriate for a State to have participants other than the ten representatives specified in Section 107(a)(1) of the Act involved in the decision-making process regarding provisions of the State plan.
>
> Response. While representatives of other groups may participate in the planning process, only one designated representative from each of the ten groups specified in Section 107(a)(1) of the Act must be involved in the approval of the provisions of the five-year State Plan or the annual plan. No change is made in the regulation.

Comment. A commenter asked if it is possible for the State Board to design the membership of the planning group in such a way that the State educational agency's personnel constitute a majority of the voting membership. This commenter also wanted to know whether the state board may appoint several persons for each category or if it is limited to only one representative for each.

Response. Although there is no requirement that each representative to the planning group have a vote, the responsibility for decision making regarding approval of the provisions of the State Plans is limited to one designated representative for each of the ten categories set forth in Section 107 (a)(1) of the Act. One person may represent more than one of the ten categories if the agency he or she represents has responsibility for more than one of the designated areas. No change is made in the regulation.

The responses, although not extremely clear, seem to separate participation in the planning process from decision making concerning the state plan --allowing the former to be open but limiting the latter to the designated representatives. While the purpose of the separation may be to keep the state board from "stacking the deck" on decision making, further interpretation by some states tended to limit the committee even further. Such restrictive interpretation is illustrated by one state board's response to a SACVE recommendation that the board invite representatives from organizations representing disadvantaged, handicapped, minorities, and women to serve on the planning group designated in Section 107.

In the final Rules and Regulations promulgated by the U.S. Office of Education in October, 1977 in the "Comments and Responses" appended to the rules, the Commissioner of Education took the position that membership of the s.107 Planning Participants cannot be expanded beyond the membership designated by the Act. (See Appendix B, Rules and regulations, DHEW, Office of Education, Federal Register, Vol. 42, No. 191, Monday, October 3, 1977, Comment and responses to section 104.162 Representation on Planning Group, page 53872.)

The interpretation here seems to have lost the nuance of participation versus decision making on the 107 Committee; the federal law is construed as prohibiting participation by any but designated agencies. In this case, the overly restrictive interpretation has apparently thwarted Congressional intent to individualize the 107 Committee structure to the needs of the state and may have narrowed its perspective as well as its membership.

2.2.3 The State Advisory Council

The State Advisory Council on Vocational Education (SACVE) may be viewed as the voice of the consumers of vocational education and as a committee devoted primarily to the evaluation of vocational services. The Congress extended three roles in the planning process to the SACVE:

- act as a representative on the 107 Committee;
- review and comment on the plan; and
- consult with the state board concerning the overall conduct of the planning process.

These multiple roles are intended so that SACVE could usefully serve to bring both the voice of the groups it represented to the planning table and continue its watchdog role through review and comment. The mission to consult may be understood as a way of bringing SACVE concerns more emphatically to the attention of the state board than might be possible through representation on the 107 committee alone.

All the SACVE directors interviewed saw the 107 Committee representation as a valuable formal link with the planning process of the state agency. In ten of the sample states, the 107 Committee membership and the sign-off function were the only contact the SACVE actually had in the planning process.

In five others, there was some additional role played by the SACVE. In three cases. separate meetings between the board and the SACVE were held to explain the plan and get input from SACVE members. In one state, the SACVE reported a great deal of informal coordination throughout the planning process. In the last instance, the SACVE believed it had influenced the state board to review and eventually change at least one decision of importance. State board administrators, however, voiced some concern as to the "muddy" role SACVE was attempting to play in the process. One state director said, "How can they come in and help to formulate the plan and then go back and evaluate it?"

Lack of clarity concerning a SACVE's role in planning serves to limit its participation in the state planning process. Given that the other (and major) SACVE role is one of evauation and in that role it is required to perform certain "watchdog" functions, the relationship between some SACVEs and state agencies has become an adversarial one. This in turn hampers the SACVE in performing its assistance functions. Among the sample states, six SACVEs

were deemed to maintain an adversarial relationship with the state agency, and nine an assistance-oriented relationship. While not all assistance-oriented agencies has become an adversarial one. This in turn hampers the SACVE in performing its assistance functions. Among the sample states, six SACVEs were deemed to maintain an adversarial relationship with the state agency, and nine an assistance-oriented relationship. While not all assistance-oriented SACVEs were granted input to the planning process other than through 107 Committee membership and plan review, no SACVE with an adversarial history vis-a-vis the state agency played an assistance role in the planning process (see Table 2.2).

2.2.4 The Public Hearings

Congress intended the public hearings to open up the vocational planning process so that the concerns of constituencies outside the system might be heard. Furthermore, these concerns were to be taken seriously and responded to by the state board. The board was required by the regulations to include any recommendations rejected in state planning documents and give reasons for their rejections.

According to respondents in the sample states, the public hearings were unsuccessful in attracting the general public whose views Congress was seeking. However, the hearings were at least partly successful in attracting advocacy groups within and outside the system. For example, at a public hearing in one state, the Legal Defense Fund fired its first salvo in the long battle with the state concerning its funding formula. In another state, business teachers who were concerned about redefinition of business programs used the hearings as a forum to express their displeasure. And in another state, the SACVE director, frustrated with the lack of information coming from the state board, appeared at a public hearing "to get some answers."

One major impediment to the public hearing process is the logistics required to organize the hearings. For example, the task of making the state plan available to participants prior to the hearing so they could have time to review it was cited by our respondents as a common problem. The following excerpt from a 1979 state advisory council in one state report illustrates the problem by quoting comments made at a public hearing:

> The public hearing is not a good procedure because if for some reason a representative is not attending a hearing, then they don't get the state plan. Also, at the public

Table 2.2

SACVE ROLE IN PLANNING IN SAMPLE STATES

RELATIONSHIP WITH STATE AGENCY	TYPE OF INPUT TO PLANNING PROCESS	
	NUMBER OF SACVES WITH 107 COMMITTEE MEMBERSHIP AND SIGN-OFF ONLY	NUMBER OF SACVES WITH OTHER INPUT
Adversarial	6	0
Assistance	4	5

hearing if a person is going to speak intelligently about the state plan they can't go into the public hearing and then quickly analyze it and comment about what is in the state plan. The hearing lasts only an hour or two. I think the procedure for disseminating the state plan needs to be looked at. I can 't see any reason why with all the mailing in the state, we can't mail at least one copy to the superintendents and community college presidents prior to the public hearings so we will know what we are going to the public hearings about.

We had no idea there was going to be this drastic a change in the state plan.

We need to have an opportunity to review the plan before the public meeting.

The requirement that views expressed at public hearings be included in state plans was seen as "more trouble than it was worth" by most of the vocational education administrators we interviewed. From the preceding examples, however, it seems likely that the assurance that the views must be dealt with by the state agency that caused the hearings to be chosen as a forum.

Table 2.3 displays the number of rejected recommendations in ten sample states and shows the most common reasons given for the rejections. These reasons are listed below with brief explanatory comments.

1. It's already being done. The state will frequently refer the questioner to some other section of the plan or to some other document to show that the concern is already being addressed.
2. Will do it in future, but can't afford it currently. In this case, the state board agrees with the concern but deems it a priority for the future given current financial constraints.
3. No funds for this purpose. This differs from reason (2) in that the state board does not see the concern as priority now or in the future.
4. Legality. This is the reason most frequently given in rejection of public recommendations. There are two sides to the coin of legality: (1) it's illegal, (2) it's not required by law. Of these, the second is the more common response.
5. Response doesn't answer concern. Occasionally, although a recommendation is clearly rejected, the basis for rejection is unclear from the response.
6. Other reason. Here the state board answers the question by saying, "We think the way we do it now is superior to

Table 2.3

RESULTS OF PUBLIC HEARINGS IN SAMPLE STATES

	NUMBER OF RECOMMENDATIONS	NUMBER REJECTED	REASONS FOR REJECTIONS:* 1	2	3	4	5	6
Alabama								
1978	45	8	✓		✓	✓		
1979	6	2	✓	✓				
1980								
California								
1978	4	1		✓				
1979								
1980	4	2						✓
Colorado								
1978								
1979	21	8				✓		✓
1980	7	3				✓		
Florida								
1978								
1979								
1980				✓		✓		✓

*See key in text.

Table 2.3

RESULTS OF PUBLIC HEARINGS IN SAMPLE STATES

(continued)

	NUMBER OF RECOMMENDATIONS	NUMBER REJECTED	REASONS FOR REJECTIONS:* 1	2	3	4	5	6
Illinois								
1978	42	22		✓		✓	✓	✓
1979	19	7	✓			✓		✓
1980	4	2						✓
Kentucky								
1978	110	98				✓		✓
1979	27	8	✓	✓			✓	✓
1980	26	5	✓		✓			
New York								
1978	37	8			✓	✓	✓	
1979	23	13		✓		✓		✓
1980								
Oklahoma								
1978	8	2	✓			✓		
1979	5	0						
1980	11	1				✓		

*See key in text.

Table 2.3

RESULTS OF PUBLIC HEARINGS IN SAMPLE STATES

(continued)

	NUMBER OF RECOMMENDATIONS	NUMBER REJECTED	REASONS FOR REJECTIONS:* 1	2	3	4	5	6
Oregon								
1978	20	1				✓		
1979								
1980								
Pennsylvania								
1978	131	6*				✓		
1979								
1980								
Texas								
1978								
1979								
1980	3	2		✓		✓		

*See key in text.

what you suggest" or "We don't agree with your suggestion." In other words, the state board overrules the commenter, which is its prerogative.

2.2.5 Review by SETC Representative

The State Employment and Training Council (SETC), as the state-level representative of CETA, received both a 107 Committee position and sign-off privileges on the state plan. This provision constituted one link in the overall CETA/vocational education coordination chain (see Chapter 4).

2.2.6 Review by Sex Equity Personnel

The review and sign-off of the plans by sex equity personnel is intended to assure that the plan is sex fair. Sex equity coordinators in two of the sample states say that they were able to extend their roles beyond a review function to achieve active participation in the formative phases of planning. Most others report "some" participation but no formal roles. None of the sex equity coordinators in the sample states had refused their signatures to a state plan, although some had requested some changes (especially in wording). As one sex equity coordinator pointed out, "It would take something very big to make me refuse my signature. After all, I'm supposed to work in this place [the state agency] and within the system. It wouldn't be a constructive thing to do."

The inherent limitation of the mandated role in planning is one which few sex equity coordinators have been able to expand. The review role is a more limited source of leverage for the sex equity coordinators; the role tends more to reflect the place they have achieved in the system than to bring them closer to the core planning group.

2.3 RELEVANCE REQUIREMENTS

Congress considered good labor market information to be the key to planning relevant programs. Thus, the separation of relevance requirements from process requirements is a somewhat artificial one.

Reacting to the GAO finding that data for planning were generally "unavailable, inadequate, or unused," Congress took steps to (1) make more

data available through the creation of the State Occupational Information Coordinating Committee (SOICC); (2) generate more adequate labor supply data through the implementation of the VEDS system; and (3) ensure that figures were used by requiring that states include in their state plans

> an assessment of current and future needs for workers (job skills) within the state and where appropriate within the region of the country. This assessment shall reflect the latest available data of present and projected employment, including the data available from the SOICC.

In this section, we look at the labor market supply and demand data, with particular reference to the SOICC. The VEDS system, however, is included in the discussion on evaluation (Chapter 3).

2.3.1 The State Occupational Information Coordinating Committee (SOICC)

In creating the National and State Occupational Information Coordinating Committees, Congress sought a vehicle to assist the states develop a comprehensive labor market information system for use by all the providers of manpower training at the federal, state, and local levels. Essentially, the mandate outlined in P.L. 94-482 to the National and State Occupational Information Coordinating Committee networks was to

> . . . develop and implement an occupational information system to meet the common occupational information needs of vocational education programs and employment and training programs at the the national, state, and local levels, which system shall include data on occupational demand and supply based on uniform definitions, standardized estimating procedures, and standardized occupational classifications. [Also to] improve coordination between, and communication among administrators and planners of programs authorized by this Act and by the Comprehensive Employment and Training Act of 1973, employment security agency administrators, research personnel, and employment and training planning and administering agencies at the Federal, State, and local levels. [Section 161(b)(1) and (b)(2)]

The legislation states specifically that the SOICCs should:

> . . . implement an occupational information system in the state which will meet the common needs for the planning for, and operation of, programs of the state board assisted under the Act, and of the administering agencies under the Comprehensive Employment and Training Act of 1972.

To facilitate their development, each of the SOICCs had, as the committee governing their activities, the heads of the agencies representing the state board governing vocational education (sole state agency), the State Employment and Training Council, the State Employment Security Agency, and the agency representing vocational rehabilitation.

Congress hoped that the problems identified in the use and availability of labor market information would be remedied if representatives of the primary agencies delivering public occupational training were brought together to develop a common set of data needs and uses. These agencies could then translate this uniform and accurate information into a system of coordinated program planning. While the membership of SOICC was specifically described in the legislation, the administrative and fiscal structures were not.

The start-up time for SOICCs varied widely among the sample states. Six had legally established SOICCs in 1977 which were operating to some degree by late 1977 or early 1978. The last state to appoint a director did so in January 1980--a two-year span.

There was also a great variety in the bureaucratic base of operations of SOICCs. Five states used the CETA governing agency as their "home base"; three states aligned with the vocational education agency; two work with the employment security department; and the remaining SOICCs appear in a variety of configurations, ranging from a nonprofit agency to one SOICC which had gone through almost as many fiscal and physical homes as there are statutory agencies on the Committee. (In this state, the SOICC was described as having its office furniture in storage almost as much as it was in the office.)

The focus of SOICCs, as they have attempted to fit the configuration of particular states, has varied. States, with either already-existing career information systems (CIS) or automated systems which supplied information on the supply and demand for workers, seem to have had an easier time in defining a SOICC role. In eight such states, there was at least an opportunity for SOICCs to become involved in an activity corresponding with their mandate "to develop and implement an occupation information system." In some cases, the SOICC assumed responsibility for the operation of that state's management information system (MIS); but two states which had extensive vocational education MISs chose to maintain them within the state department of education and

let the SOICCs find another role. In these last two, the SOICC had difficulty in pursuing any activities directly related to their mandate.

In states which either had no CIS/MIS or chose not to let SOICC become involved in these activities, SOICCs were forced to define their role differently. This caused confusion for agency personnel and even SOICC directors over what they were supposed to do. The problem of start-up was heard in all 15 states, but was particularly evident in the seven states which had had no system in place to serve as the foundation of SOICC activities.

Within their broad Congressional mandate, SOICC activities generally fall into two major categories: (1) those designed to improve occupational supply and demand information, and (2) those designed to promote cooperation among member agencies.

We found that the effectiveness of SOICCs was severely hampered by tardy establishment and, more importantly, the time they have taken to find and execute a goal. An important limitation to their success, even under the best of circumstances, is that SOICCs are dependent on existing data--they are not data-generating agencies, but data-coordinating agencies. Therefore, a SOICC can never be better than the data available to it; states with deficient information systems likely will have unsuccessful SOICCs.

2.3.2 Uses of Supply and Demand Data

Two major elements of Congressional intent pertain to the use of supply and demand data. The first was that states would use standardized data as a basis for program planning: matching the supply of workers to current projected labor market demand. The second element was that Congress sought to encourage the states to "think bigger" than they traditionally had in terms of both supply and demand. Congress intended states to include (if possible) in the estimated supply workers from secondary and postsecondary vocational programs; those trained by CETA; graduates of private vocational schools; those who become available through migration; and those who, though not vocationally trained, nonetheless compete with vocational students for jobs. In terms of demand data, the regulations were that the assessment of employment opportunities shall be "within the state and, where appropriate, within the region of the country" [Regulation 104.183]. Since vocational education has traditionally been most responsive to local needs and conditions (often on the basis of

informal needs assessment), Congress was apparently asking states to move away from an orientation considered parochial.

As shown in Figure 2.5, very little variation exists among the sample states in the sources of demand data presented in the five-year and annual 1979 plans. Nor, in general, were many different sources used. Where multiple sources were used, several were specialized (e.g., demand in the area of agriculture). Only three states apparently used data available from the Department of Labor in preparation of their five-year plans. Since five states gave neither source nor data in the 1979 annual plans, it is impossible to see any changes that may have occurred.

Figure 2.6 displays the inclusiveness of the labor supply data in the five-year plan. States generally coped with the need to accumulate data on enrollments within the public education sector, but were unable to go beyond that segment. Only two states attempted a total supply projection in the preparation of their five-year plans; even by 1979, only three states were able to compile CETA supply data.

What cannot be seen from Figure 2.6, but is extremely important in understanding the state response to Congressional intent in this area, is the amount of credence placed by state and local administrators on supply data, demand data, and the match between them. Doubt was expressed by most state and local administrators when asked about the reliability and validity of the data available from any or all of the sources quoted in state plans. Those figures considered adequate by state agencies to approve local programs and those considered necessary to submit as part of the state plans are not necessarily the same thing. This is not to accuse state agencies of duplicity nor to say that they depend only on data provided in local applications. The difference is primarily one of degree. Supply and demand data are often one dimension of the framework within which program applications are approved. State administrators are unlikely to approve a program in a program area already known to be glutted or for which no demand can be proven; however, they are likely to give approval based on other factors, including: student interest, the availability of instructors, cost of the program, community support, and (in the case of continuing programs) evidence of success such as student placement rates.

Figure 2.5

DEMAND DATA SOURCES

STATE	FIVE-YEAR PLAN	1979 ANNUAL PLAN
Alabama	Alabama Department of Industrial Relations, Bureau of Statistics	No source
California	California State Employment Development Division: Davis Study California Manpower Management Information System (agricultural only)	No source
Colorado	Bureau of Labor Statistics: Employment Security Study; "Colorado's Manpower Health Occupations" Study, 1972	Same
Florida	No source	Florida Department of Commerce, Bureau of Labor Statistics
Illinois	State Governor's Office of Manpower and Human Development; Occupational Manpower Projections	No demand data
Indiana	Indiana Employment Security	Same
Kentucky	Kentucky Department of Human Resources; Kentucky Department of Education	Kentucky Department of Human Resources

Figure 2.5
(cont'd.)

STATE	FIVE-YEAR PLAN	1979 ANNUAL PLAN
New Hampshire	"Not collected on a controlled, coordinated basis throughout the state"	
New Mexico	No source	No source
New York	Formula based on U.S. Department of Labor Statistics	
Oklahoma	Department of Labor, Bureau of Labor Statistics; Oklahoma Department of Employment Security; State University Farm; Manpower Projections; "Employment Opportunities and Educational Needs in Off-Farm Agribusiness" Occupations (a study)	Same
Oregon	State Department of Human Resources, Occ. Employment Division	Same
Pennsylvania	Pennsylvania Department of Labor and Industry; U.S. Bureau of Labor Statistics	No demand data

Figure 2.5
(cont'd.)

STATE	FIVE-YEAR PLAN	1979 ANNUAL PLAN
Texas	Texas Employment Commission; Interim Manpower Projection Program; Agriculture Extension Service Specialists; U.S. and Texas Departments of Agriculture; County Agriculture Agents; U.S. Department of Commerce	Texas Employment Commission; Interim Manpower Projection Program; State 1202 Commission on Postsecondary Education
Wisconsin	Wisconsin Department of Industry, Labor and Human Relations	Same

Figure 2.6

INCLUSIVENESS OF STUDENT SUPPLY DATA

STATE	VOCATIONAL EDUCATION:						CETA	OTHER	CHANGE IN ANNUAL 79
	SECONDARY	POST SECONDARY	ADULT	COM COL	PRIVATE	TOTAL-NOT BY INSTITUTION			
Alabama	X	X	X	X	-				None
California	X	-	X	X	-				None
Colorado						X + Migration			None
Florida						X + CETA Migration approach			
Illinois	X	X	X	X					No community colleges
Indiana	X	X	X						CETA included
Kentucky	X	X	X	X					CETA included
New Mexico	X	X		X					None
New York	X	X	X	X					No community colleges
Oklahoma	X	X	X	X		X Trade schools			No community colleges
Oregon	X		X	X					
Pennsylvania	X	X	X						
Wisconsin	X	X							

The question of credibility of labor market data is a state-of-the-art problem. As Harold Starr writes in a paper on vocational education planning processes:

> Many of those placed in the role of data consumers (e.g., school administrators) often doubted the accuracy and/or usefulness of the employment data that were provided to them by data suppliers (e.g., state division planners, state employment services personnel). [The problems include] (a) lack of correspondence between available employment data and local needs; (b) difference in usability of available employment data between urban and rural areas; and (c) contradictions between data that are available to local schools and experiences of vocational education graduates in the labor market.

The amount of faith vocational administrators put in data seems to vary, roughly, with its source. Local information appears to be considered most "believable"; national data, the least. Vocational educators seem to be consumers of information through craft committees, ongoing employer contacts, local needs assessments, and the informal student follow-ups that traditionally characterize vocational education programs. Local political pressures are influential in decisions concerning program offerings. When local industries appear before a local school board and demand that certain programs be offered, it is almost a certainty that the local school board will be responsive, regardless of what formal data may indicate.

The importance of student placement rates is a point of agreement between state and federal perspectives. State personnel, however, say that these rates are one aspect of a successful program; they believe the federal government views placement rates as the only proof of success.

2.4 DOCUMENTS REQUIREMENTS

The multiple and complex requirements for documentation, placed on the states by the 1976 Amendments, respond directly to GAO findings. These requirements bear witness to the faith which Congress possessed that good planning documents could be produced by the states and the conviction that

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*Starr, Harold, C. Maurice, H. Herz, and G. Zahniser, Coordination in Vocational Planner--Barriers and Facilitators, Columbus, Ohio: National Center for Research in Vocational Education, 1980, p. 22.

until now good planning documents had not been produced by the states. Both the Senate and House committees agreed that the problem with state plans was that they were "compliance" documents. The Senate report states:

> Although the Office of Education is now requiring the States to submit considerable amounts of data, the problem seems to be that this data is reported solely on a compliance basis and that it is not being transformed into information which can be used for decision-making, according to Dr. Donald Drewes of the North Carolina State University Center for Occupational Education.

It was repeatedly stressed to the committee that the document submitted by the states was not a planning document, but rather was a compliance document. By this, witnesses meant that the materials submitted were the paperwork necessary to comply with the face of the statute, but did not reflect the planning effort undertaken by the State to determine its vocational education program for the year, or the basis of such a determination.

The legislative committees had an idea of what characteristics or traits a plan must reflect to raise it above the level of a compliance document. The quotation above indicates that such a plan would contain "information that could be used for decision making" and would show "the basis" of a determination made by the state as to its vocational programs for the year. Elsewhere, the Senate report says that a comprehensive planning document is one which "reflects a state's assessment of its needs for vocational education taking into account populations to be served, job markets to be met, regional distribution and special needs." (p. 47799)

As the requirements of the Act merged, they represented an attempt to codify these intents into a series of documents each of which would serve a slightly different need. To begin with, there was the five-year plan, a new requirement in this legislation and one which was based on a perceived lack of long-range planning in state vocational education. The Senate and House committees were not in agreement on how long a period this plan should cover--the Senate favored the five-year plan, while the House thought three years was more appropriate. The latter believed that five years was too long a period for states to "set realistic objectives that they are held accountable for." The intent of Congress was that the five-year plan serve as a comprehensive, long-range "blueprint for the state's effort in vocational education." (Regulations 104.181-104.188 deal with the content of five-year state plans.)

Annual plans were, according to the Senate, to "represent reasonable steps toward meeting these [their five-year goals]" (p. 4787) and would "also serve as a yardstick to the state to measure its own successes." (Senate, pp. 4785-86)

In addition to the five-year plan, the legislation augmented the traditional annual plan with another new requirement--the accountability report. This document was envisioned to serve both BOAE and the state vocational administration with useful program management information. The accountability report was intended to help a state to take its pulse regarding its vocational program delivery system:

> Although the Office of Education now requires the States to submit an annual report on the uses of Federal funds, this report has been found to be lacking in giving a complete description of these uses and especially of the reasons the States have for choosing such uses. The Committee bill [section 108) seeks to redress this failing by requiring in much greater detail the exact contents of these annual accountability reports.
>
> In particular, the States will have to report every year on the degree to which they have achieved the objectives they set for themselves in their State plans, including a description of this progress in terms of courses, enrollments, allocations of responsibility, and allocations of resources. The States will also have to include a description of how Federal funds were distributed among local school districts and other public agencies in conformance with the new Federal requirements concerning this distribution.

The General Accounting Office stated:

> Office of Education regional officials told us there was little or no evaluation of State programs as they actually operated and that the Office of Education, therefore, had little assurance that policies and procedures delineated in Office of Education-approved State plans were carried out.

Taken as a whole, the three major state documents (five-year plans, annual plans, and accountability reports) were meant to form a cohesive system of documentation; a useful set of papers at the federal and state levels; and a vehicle for dissemination of state policies and goals to the local level and to the general public.

Another of the major elements of Congressional intent in revising the documents requirements was to reduce the sheer volume of paperwork flowing

from the states to the Bureau of Occupational and Adult Education (BOAE)--much of it, according to GAO, unreadable and unread. Both the Senate and the House, as these excerpts indicate, felt strongly about this redundancy of paper:

> . . . [A] mound of paper is required to be prepared at the State level and transmitted, through the Office of Education regional offices, to Washington. The Committee bill seeks to cut down substantially on this unnecessary paper flow.
>
> The net result of all these requirements is that a tremendous amount of unnecessary paper flows into Washington annually--paper which takes hundreds of man-hours to prepare and which is of little practical use to program administrators at the State or Federal level. Indeed, the Committee has serious doubts that any employee of the Bureau of Occupational and Education area reads the material other than to assure that all the blanks are filled in.
>
> It seems that what is occurring now is that the Office of Education is demanding a great deal of paperwork and detailed data from the States and local school districs but then there is no follow-up to determine whether the States are complying with the law and no efforts are being made to assist the States in operating their programs better. In other words, a blind concentration on seeking compliance on paper with the process has led a total neglect of trying to seek the results the process was created to achieve.

A major way to address the paperwork problem was explained in the Senate committee report:

> The Committee bill divides existing planning requirements into three different types. General assurances--the "boilerplate" administrative provisions--are made once and kept on file with the Commissioner. A long-range plan is made only once. Only the most streamlined planning document is required to be submitted annually for approval.

In contrast with Congressional intent, the administrators interviewed in the sample states believed unanimously that the primary purpose for preparing and submitting state plans was to serve as a basis for measuring state compliance. Since federal funding was dependent on federal acceptance of their state plans, this concern overrode all others in the process of planning. The major outcome of the mandated planning process at the state level was a planning document which would be acceptable to the federal government and successful in procuring needed federal funds.

A review of the five-year plans, the annual plans for 1979, and the 1978 accountability reports for the sample states reveals that even a judgment

of compliance would be difficult to make on the basis of these documents alone.* Figure 2.7 examines the five-year plans, the most ambitious of the required documents, in terms of the regulations. The major caveat applied to this figure is that states prepared the bulk of the five-year plans without benefit of the regulations--using only the Act and policy memos from BOAE. Certain omissions evident from Figure 2.7 (such as identification of the Title IX coordinator and the failure to specify criteria to avoid overlap of vocational education and CETA programs) may be attributable to the fact that these were requirements of the regulations, not of the Act.

Figure 2.7 is useful in portraying the types of trouble spots the states encountered in the preparation of their five-year plans. Some of these problems appeared to be oversights; e.g., failure to certify a sole state agency. Others were due to a delay in implementing new mechanisms; e.g., SOICCs were simply not operational in most states, and sex equity personnel were either not yet or very recently appointed.

Other key omissions from the five-year plans include:

- Nine states failed to identify new and emerging occupations.
- Seven states failed to define mechanisms for coordinating the IEPs of handicapped students with their vocational education programs.
- Ten states did not include any sources of labor supply beyond those of the public education sector.
- Five states did not project enrollments by institution type.
- Six states did not project the allocation of funds by institution type (related to the above).

While we do not have access to later correspondence between BOAE and the states (which may have remedied the omissions), it seems that states had problems meeting even the minimum standards for achieving compliance, much less the more ambitious standards of usefulness and readability.

One source of the difficulty states encountered in developing the five-year plan was the Congressional assumption that states had the capability

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*Appendix B contains an analysis of these documents in greater depth and for a larger number of states than is presented here.

Figure 2.7

THE FIVE-YEAR PLANS AS A MEASURE OF COMPLIANCE

Sample States	Certifications 104.171	Local Applications and Federal Priorties 104.182	Employment Opportunities 104.183	Goals to Meet Employment Needs 104.184	Funds to Meet Employment Needs 104.184	Funds to Meet Program Needs 104.186	Policies to Eradicate Sex Discrimination 104.187	Coordination with CETA 104.188
Alabama	All	All	No SOICC Data	Supply Data From Public Ed. Only	All	No #'s to be Served - No Details--Excess Costs	No SEC No Title IX Coordinator	All
California	No 107 Committee Meetings - No Sole State Agency Certification	No New and Emerging Occs. - No Mechanism for Coordinating IEP with Voc. Ed.	No SOICC Data	Supply Data from Public Ed. only - No enrollments by Institution Type- No Funds Allocation by Institution Type	All	No Funds Usage for LEPs - No # to be Served of any Target Group- No Details of Set-Aside	No SEC No Title IX Coordinator	All
Colorado	All	No Identification of New and Emerging Occs.	All	Supply Data from Public Ed. Only - No Enrollments by Levels-No Enroll-by Institution Type - No Funds Allocation by Institution Type		No #s to be Served - No Details of Set-Asides	No Local Application Requirements re Sex Equity	No Criteria to Avoid Duplication of Programs
Florida	No Sole State Agency Certification	No Identification of New and Emerging Occs. - No Mechanism for Coordinating IEP with Voc. Ed.	No SOICC Data	All	No Description how Funds Used to meet Employment Goals - No Reason for Choosing Uses of Funds	No Separate Objectives for Handicapped and Disadvantaged No Details on Use of Set-Asides	No Local Application Requirements re Sex Equity - No Measurable Objectives	All
Illinois	All	All	No SOICC Data	All	No Description of intended Expenditures for Local Administration	All	No Policies to Encourage Both Sexes to Enroll in Non-Traditional Programs No Relationship of SEC to Sex Equity Goals	No Criteria to Avoid Duplication of Programs

Figure 2.7 (continued)

THE FIVE-YEAR PLANS AS A MEASURE OF COMPLIANCE

Sample States	104.171	104.182	104.183	104.184	104.185	104.186	104.187	104.188
Indiana	All	No Clear Identification of new and Emerging Occs - No Mechanism for Coordinating IEP with Voc. Ed.	No Dates for Data - No SOICC	Supply Data from Public Ed. only - No Projected Enrollments by Institution Type No Funds Allocation by Institution Type	All	All	No Relationship Activities to Goals - No Objectives in Measurable Terms No Model Programs No Title IX Coordinator	No Criteria to avoid Duplication of Programs
Kentucky	No Evidence of 107 Committee Meetings	No Definition of Economically Depressed Area No Identification of New and Emerging Occs	No Dates for Data - No SOICC	Supply Data from Public Ed. only	No Maintenance of Effort Assurances	No Details of How Set-Asides are Used	No Description of Reporting Relationship of SEC No Objectives in Measurable Terms No Title IX Coordinator-No Enrollments by Sex-No Equal Access Policies	All
New Hampshire	All	No Identification of New and Emerging Occupations	No SOICC Data	Supply Data from Public Ed. only	All	No Description of Use of Funds for LEPs-No Details on Set-Asides No #s To Be Served	No Title IX Coordinator - No Enrollments by Sex-No Equal Access Policies	No Criteria to Avoid Duplication of Programs
New Mexico	No Evidence of 107 Committee Meetings-No Sign-offs by 107 Committee No Sole State Agency Certif.	No Identification of New and Emerging Occs.-No Mechanisms for Coordinating IEPs with Voc.Ed.	No Dates for Data No SOICC Data	No Projected Enrollments by Institution Type-No Funds Allocation by Institution Type	No intended Expenditure for Local Administration	No # to be Served - No Details of Set-Asides	No Relationship of SEC Activities to Goals-No objectives in measurable terms-No Title IX Coordinator-No Special Courses for Displaced Homemakers	No Criteria to Avoid Duplication of Programs
New York	All	No Mechanisms for Coordinating IEPs with voc.ed.	No SOICC Data	Supply Data from Public Ed. Only	No Intended Expenditures for Local Admin.	All	All	All

Figure 2.7 (continued)

THE FIVE YEAR PLANS AS A MEASURE OF COMPLIANCE

Sample States	104.171	104.182	104.183	104.184	104.185	104.186	104.187	104.188
Oklahoma	All	All	All	Supply Data From Public Ed. only No 6 Digit Codes	No Projected Expenditures for Local Adm.	No # to be Served-No Separate Objectives for Disadv. and Handicapped-No Details of Set-Asides	No Involvement of SEC in Plan Dev.-No Reporting Relationship of SEC Activities to Goals-No Objectives in Measurable Terms-No Title IX Coordinator	No Criteria to Avoid Duplication of Programs
Oregon	All	No Mechanism for Coordinating IEPs and Voc.Ed.	No SOICC Data	Supply Data from Public Ed. Only No Projected Enrollments by Institution Type No Funds Allocation by Institution Type	No Maintenance of Effort Assurances	No Details of Set-Asides	No Involvement of SEC in Plan Dev.-No Reporting Relationship of SEC Activities to Goals-No Objectives in Measurable Terms-No Title IX Coordinator and No Enrollments by Sex-No Equal Access Policies No Displaced Homemaker Courses	No Criteria to Avoid Duplication of Programs
Penn.	All	No Identification of New and Emerging Occs.	No SOICC Data	Supply Data from Public Ed Only	No Projected Expenditures for Local Adm.	No Precise Use of Funds for LERs	(Meets only 3 requirements)	No Criteria to Avoid Duplication of Programs
Texas	All (but only one public hearing)	All	No SOICC Data	No Funds Allocation by Institution Type	No Projected Expenditures for Local Adm No reasons for Choosing Uses of Funds	No Details of Set-Asides	No Title IX Coordinator No Equal Access Policies	No Criteria to Avoid Duplication of Programs
Wisconsin	One Sign-off Missing	No Definitions of Economically Depressed Areas No Identification of New and Emerging Occs. No Description of How Funds to be Distributed-No Mechanism for Coordinating IEPs with Voc. Ed.	No SOICC Data	No Clear Description of Goals	No Maintenance of Effort Assurances	No #s to be Served-No Separate Objectives for Disadv. and Handicapped-No Details of Set-Asides	No Authority and Reporting of SEC Activities to Goals-No Measurable Objectives-No Encouragement of Both Sexes for Non-Traditional Programs-No Title IX Coordinator-No Enrollments by Sex No Equal Access Policies	All

to design and produce planning documents which could simultaneously serve as (1) a contract with the federal government, (2) an aid to improving programs at the state level, and (3) a vehicle for dissemination at the local level. In trying to meet these multiple purposes, a number of states fail to address any of them adequately.

Another problem was the five-year duration Congress considered an appropriate length of time for long-range planning. Administrators interviewed in the sample stated unanimously that they could not find reliable demand data covering a five-year period nor could they accurately project supply. As a result, many state plans were very conservative in their estimates, since states feared being held accountable for setting unrealistic objectives.

2.5 CONCLUSIONS

In one sense, the factors which have been singled out as important in affecting the implementation of the planning requirements suggest two conclusions. First, various parts of the planning system have been either slowly or imperfectly implemented. Second, since the system was intended to function as a cohesive whole, overall implementation has fallen short of Congressional intent. These conclusions may be important in themselves, but they do not tell the whole story.

It appears that the process requirements, as implemented at the state agency level, result in activities which operate in virtual isolation from the more substantive set of planning activities which go on within state agencies. Also, the requirements to use labor market data have frequently resulted in two semi-independent streams of data, one which serves as justification to the federal government for the states' choices of program offerings; the other, an ongoing network of formal and informal information exchanged between local and state agencies and used as the basis of program approval.

The major explanation for these outcomes seems to be that the federal planning requirements have constructed a planning model which does not fit the system in which it is being implemented. The model presupposes a "top-down" planning process at the state level, one in which the state agency exercises primary authority over a set of local agencies responsive to its authority.

In fact, the system is apparently characterized by a "bottom-up" plan, one in which the state agency exerts limited authority over relatively autonomous local agencies. This system is governed by two important elements--local autonomy and the traditional role assumed by state agencies which serves to enhance local autonomy.

Local autonomy was the single factor most frequently mentioned in interviews as affecting implementation of the provisions of the Act. There are two elements which operate to increase the importance of local autonomy--one is the actual independence of local agencies from state authority, and the other is the role traditionally assumed by state agencies which acts to enhance local independence.

The actual independence of local school districts is illustrated by Figure 2.8 (adapted from a study by Westat, Inc., of vocational education governance, financing, and planning). This figure, which looks at state-level authority over local institutions and may be viewed as a spectrum of state-(Class I)-to-local (Class V) control, confirms the independence of local districts. It also shows that local autonomy is greatest at the secondary level --the level to which the majority of sole state agencies are oriented and would presumably be most influential. The sphere in which local autonomy operates most strongly, according to state personnel, is program decisions including basic planning decisions to expand, initiate and terminate programs.

Interacting with the importance of local autonomy is the extent to which the state agency chooses to take a strong leadership role. As described above, such a role is not the one favored by the state agencies in the sample states. The following quotation from Gregory Wurzburg, which appeared in a paper concerning local implementation of Youth Employment Programs, captures extremely well the posture assumed by state agencies:

> In the formal scheme of things, local education agencies are actually creatures of the state. They exist at the sufferance of the state and have taxing authority, policy and administrative authority given them by state constitutions and laws. But, by tradition, LEAs have evolved as relatively autonomous units and the amount of actual influence that state education agencies, state school superintendents, and state boards of education have on them is not as great as the formal hierarchy might imply.

Figure 2.8

CLASSES OF STATE AGENCY AUTHORITY OVER LOCAL INSTITUTIONS

STATE	CLASS I: DIRECT STATE ADMINISTRATION, FULL STATE FUNDING	CLASS II: LOCAL AGENCY UNDER DIRECT STATE AUTHORITY, FULL STATE FUNDING	CLASS III: LOCAL AUTHORITY REPORTS TO STATE, STATE AND LOCAL FUNDING	CLASS IV: UNDER POLICIES FROM NON-VOCATIONAL EDUCATION AGENCY: E.G., UNIVERSITY SYSTEM	CLASS V: ADMINISTRA VARIED STA
Alabama (secondary)		technical college community college			comprehens school; are center/sch
California (secondary)					comprehens school; are center/sch
Colorado (secondary)	community college		comprehensive high school; area vocational school; junior college		
Florida (secondary and post-secondary)			community college		comprehens school; are center/sch
Illinois (secondary)					comprehens school; are center/sch community c
Indiana (secondary)		technical college			comprehens school; are center/sch
Kentucky (secondary)	area vocational center/school; state vocational school				comprehens school
New Hampshire (secondary)	vocational college; technical institute				comprehens school; are center/sch
New Mexico (secondary)				community college	comprehens school; are center/sch
New York (secondary and post-secondary)					comprehens school; BOCES; community c
Oklahoma (secondary)		community college		municipal junior college	comprehens school; are center/sch
Oregon (secondary)					comprehens school; are center/sch
Pennsylvania (secondary and post-secondary)					comprehens school; are center/sch community c
Texas (secondary)	state technical school				comprehens school; are center/sch community c
Wisconsin (post-secondary)					comprehens school; are center/sch technical
CLASSES	6	4	4	2	
PERCENT ALL LEVELS	23.0%	10.3%	5.2%	5.2%	

> State education authorities are not effective in leading dramatic departures from established policy and status quo. They are not in a position to force unpopular policies on unwilling local educators. Although they can lead some policy change at the margin and provide technical assistance to help local schools along, they are not equipped nor inclined to direct state-wide policy overhauls. . . . This does not imply that the role of SEAs has necessarily been one of disinterest or inaction. It does not imply that state education agencies cannot be expected realistically to be agents of sweeping change in public school systems.*

One major conclusion of our study is that the model laid out for planning in the Act does not fit the system in which it was to be implemented. Given a system characterized by a prevalent pattern of bottom-up planning and operational decision making, the state agency neither has sufficient leverage nor chooses to exert sufficient authority over local agencies to implement fully the intent of the legislation.

The federal model also presupposes a rational decision-making process taking place annually within the state agency, one in which program responsibilities and funds are allocated across levels of education and among institutions on the basis of updated labor market information. In fact, the state agency operates far more as an arena of political decision making. This process is one in which the agency is the intersection of competing pressures and priorities which are negotiated (to the extent possible) in such a way that the agency can maintain accountability to the federal government and honor its commitments to local agencies. Such political decision making is characterized by compromise, mediation, and interpretation, a role which is traditionally played by state agencies.

What appears to have taken place is a phenomenon in which the federal model of a rational top-down planning process is attempting to co-exist with a traditional pattern of political bottom-up planning activities taking place in the states. The result is a great deal of planning activity--some of it taking place between the state and federal agencies, the rest of it taking place between state and local agencies, with very few points of intersection.

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*Wurtzburg, Gregory, Overview to the Local Focus on Youth, Washington, D.C.: National Council on Employment Policy, 1979.

Policy Implications

The conclusions stated above might lead to either of two directions for revision of the planning requirements of the legislation. The first is a set of sweeping changes designed to improve the fit of the requirements to the political and bureaucratic realities of the system. This might well entail the targeting of major planning provisions to local agencies and more emphasis on the development of local plans.

While we would recommend that states encourage the development of local plans, we would not advise that all planning requirements be shifted to the local level for two reasons. First, processes at the local level are not well understood and vary so greatly from one school district to another that the design of legislation directly targetted to local planning activity would be extremely difficult. Second, such legislation would not take advantage of the state agency's ability to act as intermediary and arbiter between the federal and local levels of government.

Rather, we would advocate more limited changes in the state planning process requirements for the following reasons. Many of the important parts of the 1976 Act have been implemented very slowly. (The 107 Committee and the SOICC are perhaps the best examples.) It remains to be seen what kind of influence or change these new mechanisms may be able to affect as they work into the system. New major changes would probably weaken whatever momentum has begun to occur in the state system and further heighten the cynicism of state administrators concerning the worth of implementing federal initiatives if, as soon as they are in place, the federal government repeals or cancels them.

It would seem more appropriate to the needs of the state to concentrate the federal role on providing technical assistance to the states in strengthening the parts of the system which are in place and fully implementing those which are not. Such technical assistance would most usefully be focused on aiding the states to "prod" the local agencies to produce better long-range plans; to integrate more formal labor market information into planning; and to initiate new programs to meet emerging labor market needs. Crucial to the implementation of federal intent at the local level is the use of the state agency to perform those roles which are within their actual control and concentrate on their traditional sources of leverage over local districts.

The one area in which substantial revision of federal requirements seems warranted, however, is in the set of documents requirements which are consuming excessing resources in time, personnel, and funds at the state level and still failing to meet Congressional expectations. To reduce the burden on the states and increase the usefulness of the documents produced by the state, we recommend that the focus of the five-year (or three-year) and annual plans be shifted away from being a supposed plan for all vocational programs in the state toward being a blueprint for state agency activity. Because the assumptions on which the current planning requirements are based do not fit the vocational education system, it seems unreasonable to expect that plans based on those assumptions will ever be more than compliance documents. Given this probability, it seems unwise to continue with the current requirements. The suggested changes in documents requirements have three objectives:

- to bring state plans closer to the original Congressional intent of producing blueprints for action by improving the fit between the federal requirements and the state vocational education system;
- to reduce the burden on states of reporting detailed data which they do not find useful and which is sometimes duplicated in multiple documents; and
- to allow states to present information in a format that fits their needs rather than forcing them to use a standard format which reduces the relevance of the information for their purposes.

Thus, we recommend that the detailed reporting of enrollments and labor market data now required for the assessment of employment opportunities and goals to meet employment needs in the state plans be limited to VEDS reporting and/or the state accountability report.

The state plan would be used instead as an operational plan for those activities over which state vocational education agencies do have control--their own activities. This approach could be expected not only to produce documents which are more useful to the state but also to shift the agency's attention from compliance to management. It could parallel the current requirements of Title I of the Elementary and Secondary Education Act, for example, where state education agencies are required to perform activities in six areas:

- funds allocation and fiscal accountability
- rulemaking
- application review
- technical assistance and dissemination of information
- monitoring and enforcement
- evaluating, record keeping, and reporting

The recommended approach also parallels the current requirement in the Vocational Education Act to describe the actions to be taken and incentives to be offered to eradicate sex discrimination. Sex equity coordinators in our sample state have responded to this requirement by developing quite elaborate plans for sex equity. In contrast with other aspects of the state plan, the coordinators appear to find their plans useful guides to long-range action.

In shifting to a focus on state activities, the plan would still be used as a vehicle for addressing federal priorities. Thus, we recommend that states continue, as currently required, to describe procedures to assure compliance with the general application: to describe, for example, how the state board determines economically depressed areas in order to give priorities to applications. Also, while not requiring the presentation of detailed labor market data, states might be required to describe their plans for obtaining or developing and using activities and incentives for promoting new occupations and programs new to an area. States would also be required to describe their planned activities and incentives for promoting special services for handicapped, disadvantaged, and limited English-speaking students.

Since the state plans will still have to serve as contracts regarding the use of federal funds, standard formats for all states will probably be needed for the funding portions of the plans. For the remainder of the plans, however, we recommend that states be allowed flexibility to organize their plan as they see fit under broad categories defined by federal requirements.

CHAPTER 3

EVALUATION AND DATA REPORTING

3.1 INTRODUCTION

The 1976 Education Amendments contain stronger and more detailed evaluation and reporting requirements, for both the state board and the state advisory council, than earlier laws. The 1968 Amendments had encouraged states to conduct periodic evaluations of local programs and to use these evaluations in revising their programs but, after examination, Congress felt that these provisions were having little effect. Testimony before the House Committee on Education and Labor in 1976 indicated that evaluations were being conducted by the state board in some form in most states but they generally were not systematic. Of particular concern was the lack of data on the employment success of former vocational students. The House report stated that:

> With regard to the evaluation of programs, the greatest need perceived . . . and the greatest failing, was for follow-up studies showing the job placement and satisfaction of program completers and leavers. (p. 20)

The Congressional committees were also concerned with the lack of a solid data base on vocational education. According to the Senate report,

> One of the major failings in the field of vocational education which has hampered the Committee's investigation . . . is the inadequacy of data available. (p. 68)

On the House side, there was a perception that much information was collected and reported to BOAE but that the data were incomplete and not based on uniform definitions. Finally, the Congress was concerned about the inability of state advisory councils to fulfill their legislated evaluation role adequately. The Senate committee heard testimony that council evaluations of the program were, among other things, imprecise and lacking in the necessary amount of rigor. While the committee commented that this judgment was harsh and attributed the problems to factors outside advisory council control, it did agree that the council evaluations should be improved (Senate Report, pp. 64-65).

The Congressional committees were concerned about these shortcomings in vocational education evaluation processes and data reporting for several reasons. First, the committees believed that sound data are needed as the

basis for informed formulations of federal public policy. As mentioned above, they felt that their own deliberations had been hampered by the lack of adequate information. Second, and more generally, they believed that evaluations of and data on vocational education are crucial to good planning and program improvement at the state and local levels. The Senate report stated that:

> A solid data base will give a state a basis for program evaluation. Evaluation will, hopefully, lead to improvement in program quality. Both data and evaluation can result in improved planning capability. (p. 68)

In this sense, the concern with the evaluation and data-reporting requirements can be seen as part of a larger concern with, and desire for, rational planning in vocational education.

In response to the perception that previous evaluation and data-reporting requirements were ineffective, Congress included three sets of provisions in the 1976 Education Amendments: (1) revised evaluation requirements for the state board, (2) provisions for a national vocational education data and reporting system, and (3) revised evaluation requirements for state advisory councils. In this chapter, we will look in more detail at the provisions of the 1976 Amendments in each of these three areas and will examine practices in our 15 sample states.

3.2 STATE EVALUATION PRACTICES

The 1976 Education Amendments contain two state board evaluation requirements:

> (A) Each State shall, during the five-year period of the State plan, evaluate the effectiveness of each program within the State being assisted with funds available under this Act; and the results of these evaluations shall be used to revise the State's programs, and shall be made readily available to the State Advisory Council; and
>
> (B) Each State shall evaluate, by using data collected, wherever possible, by statistically valid sampling techniques, each such program within the State which purports to impart entry level job skills according to the extent to which program completers and leavers:
>
> i. Find employment in occupations related to their training; and

ii. Are considered by their employers to be well trained and prepared for employment;

except that in no case can pursuit of additional education or training by program completers or leavers be considered negatively in these evaluations. [Section 112(b)(1)]

One key element of these provisions is the emphasis given to the employment success of program completers and leavers. As noted above, this emphasis underscores the Congressional belief that a primary goal of federally supported vocational education is to prepare students for participation in the labor force. According to the House report,

> The Committee has specified these two criteria to judge the effectiveness of programs because in our opinion, they show most clearly whether persons trained in vocational programs are showing the results of such training . . . . (p. 38)

A second key element of the state board evaluation provisions is that they be used to manage and improve programs. In addition to the provisions already quoted, the Amendments specify that states are to conduct evaluations to "assist local education agencies and other recipients of funds in operating the best possible programs of vocational education . . . ." [Section 112(b)(1)]. Further, the Amendments require that each state, in its general application to the Commissioner of Education, must provide an assurance that funds will be distributed among eligible recipients on the basis of annual applications; these describe, among other things, how the findings of any program evaluations conducted by the applicant in previous years have been used to develop the program proposed in the new application.

State and local vocational educators initially objected strenuously to the evaluation requirements. The objections centered on using job placement in related occupations, which they viewed as unduly narrow, as the major criterion of effectiveness. First, job placement does not adequately reflect the goals of vocational education: Vocational education, program administrators and instructors argued, is a broad educational program, not just a training program. Second, vocational educators argued that the criterion of job placement in related occupations holds schools to an inappropriate standard. School systems should be held accountable for imparting certain knowledge, skills, and competencies and for making certain that there is a good fit between the knowledge, skills, and competencies taught and jobs available.

However, actual placement is determined by a whole host of economic as well as personal choice factors beyond the school's control. "Hold us accountable for employability, but not employment," is the way many vocational educators phrased the concern. Beyond these objections, vocational educators voiced a fear that evaluation only in terms of placement and employer satisfaction, especially if decisions to support programs or not were to flow from results, might set up undesirable pressures. The fear is that easy-to-place students might be selected to the exclusion of the harder-to-place--minorities, disadvantaged, or women in nontraditional programs--in short, the very groups Congress most wants to reach.

The Office of Education interpreted the evaluation requirements through regulations issued on October 3, 1977, and a policy memorandum issued April 24, 1979. The regulations extend the requirements of the law substantially, especially those in Part A which are broadly directed to evaluating effectiveness. The regulations add to Part A the conditions that the evaluation of effectiveness shall be in quantitative terms and that the programs to be evaluated shall include those supported by state and local as well as federal funds (Regulation 104.402). The regulations also specify four areas in which evaluations must be conducted:

a. planning and operational processes

b. results of student achievement

c. results of student employment success

d. results of additional services as measured by the criteria suggested under (a), (b), and (c) that the state provides to special populations

Within each area, the regulations suggest criteria to be used (e.g., wage rates and duration of employment as indicators of student employment success) as shown in Figure 3.1.

The regulations answered a theoretical problem and created a practical one. Placement and employer satisfaction of program completers and leavers are still given special emphasis in Part B. However, since student employment success is merely one of four sets of criteria against which programs should be measured in Part A, the regulations are more acceptable to vocational educators than the set of criteria relating to student employment alone. Thus,

Figure 3.1

CRITERIA FOR EVALUATIONS IN THE REGULATIONS*

a. Planning and Operational Processes, such as:

1. Quality and availability of instructional offerings;
2. Guidance, counseling, and placement and follow-up services;
3. Capacity and condition of facilities and equipment;
4. Employer participation in cooperative programs of vocational education;
5. Teacher/pupil ratios; and
6. Teacher qualifications.

b. Results of student achievements as measured, for example, by:

1. Standard occupational proficiency measures;
2. Criterion referenced tests; and
3. Other examinations of students' skills, knowledge, attitudes, and readiness for entering employment successfully.

c. Results of student employment success as measured, for example, by:

1. Rates of employment and unemployment;
2. Wage rates;
3. Duration of employment; and
4. Employer satisfaction with performance of vocational education of persons who have not had vocational education.

d. The results of additional services, as measured by the suggested criteria under paragraphs (A), (B), and (C) of this section, that the State provided under the Act to these special populations

1. Women;
2. Members of minority groups;
3. Handicapped persons;
4. Disadvantaged persons; and
5. Persons of limited English-speaking ability.*

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*Regulation 104.402.

theoretically vocational educators believe that the regulations seem in line with their program purposes and with their appropriate areas of responsibility. As a practical matter, however, the regulations themselves have been a source of dissatisfaction because state administrators argue that they do not have the resources to implement all of the evaluation requirements.

In part because of their extensiveness and in part because of other factors to be discussed below, such as the availability of instruments and the perceived usefulness of the evaluation findings, the evaluation requirements contained in the regulations have not been evenly implemented. A study done for the National Institute of Education in the spring of 1978 by CRC Education and Human Development, Inc., showed that six months after the regulations were issued, most effort had gone into systematizing and increasing state-level participation in the measurement of planning and operational processes (i.e., educational inputs and program quality) and student employment success, specifically student placement:

- Thirteen states had program review procedures in place to measure planning and operational processes, while 37 other states were revising or planning such procedures;
- Student follow-up activities were in place in 20 states and were being revised or developed in another 25 states;
- Far less attention was being given to measuring student achievement: five states felt that they had adequate systems in place, while over 30 had not decided how they would comply with this requirement.*

Our visits conducted in the fall of 1979 and the spring of 1980 show much the same pattern. While the states in our sample were further along in their development of all areas, most attention and thus the most consistent implementation was still in planning and operational processes and student follow-up.

In the remainder of this section on state evaluation practices, we will describe the ways in which states have responded to the evaluation requirements in the four areas specified in the regulations. In addition, we will analyze the difficulties which state and local education agencies have

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*The CRC study does not address the evaluation of results of additional services for special needs populations.

encountered in implementing the requirements. Third, we will identify the uses to which evaluation results are put and analyze the reasons for and limits of these uses.

It is important to note that our review is limited to those activities which the states themselves formally define as evaluation. Many activities at the state, district, and school level are evaluative in nature even if not a part of a state evaluation plan. Educational agencies in all states, for example, participate in some form of accreditation process.* States also monitor program activities through annual review of local plans and applications and through supervisory visits by state and regional program staff. An examination of all these activities was beyond the scope of our study. Thus, apparent gaps in the evaluation activities discussed here do not necessarily indicate a lack of commitment or even a lack of activity. They may only indicate that there is no systematic activity in that area as part of the states' formal evaluation process. Also, our review is limited to state evaluation practices in place during the 1979-1980 school year. Several states are planning to revise parts of their evaluation process in the near future.

3.2.1 Planning and Operational Processes

The evaluation of planning and operational processes represents, as indicated earlier, the largest investment by state agencies in any evaluation activity. All states in our sample monitor planning and operational processes at the state level by some means. Typically, the procedure is a program review process based on an accreditation model, with all occupational programs in a district or institution evaluated at the same time. In only two states were program reviews still conducted by individual discipline specialists rather than as part of a coordinated, statewide process. Five states in our sample have different review procedures at the secondary and postsecondary levels.

While the 1976 Amendments have caused states to systematize their review procedures and expand them to address new issues, the monitoring of

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*This is most often performed apart from state review by some agency such as North Central Accreditation Agency.

local programs is not new. Five states in our sample, for example, had their current review process in place before 1976, though at least two of these states have made some modifications to respond to the 1976 Amendments.

Program reviews usually have three sequential components: a self-study (internal review) by the district, institution or program being evaluated; an on-site visit by an external review team; and a procedure for correcting deficiencies identified by the team.

Internal Review

The self-study evaluation or internal review conducted by local educational agencies is a formal evaluation component in most states. The internal reviews usually cover a wide range of topics as shown in Figure 3.2 and often parallel those addressed by the external review. They are not, however, always mandatory.

The states that require or encourage formal self-review procedures by local agencies take a number of steps to ensure uniformity in the data collected. Most state agencies supply the local agencies with standard forms consisting of some combination of requests for quantitative data, yes-no checklists, and rating scales. Quantitative data may include such items as budgets, enrollments, student/teacher ratios, and course offerings.

Internal review is most often the responsibility of program instructors and administrators. In addition, some states require input from students, local advisory council members, counselors, graduates, and community representatives. The review procedure for one state with an extensive self-evaluation procedure includes a steering committee that is made up of the local vocational education coordinator (as chairperson), principal, guidance director, coordinating teacher, public relations specialist, academic representative, student/graduate representative, and LACVE.

Internal review is most often seen as preparation for an on-site visit. In addition to providing a mechanism for the updating and pulling together of documents and data on programs, facilities, and students, the self-evaluation reports are almost uniformly reviewed by site teams in advance of their visitation. Beyond its use for external review team preparation, the self-study is intended for program improvement and modification. It is expected that review will identify areas of need and help to establish priorities for program improvement.

Figure 3.2

EXAMPLES OF TOPICS COVERED IN PROGRAM REVIEWS

Program Operations/Management

- administration
- supervision
- planning and evaluation (philosophy, goals, objectives, needs assessment, short- and long-range plans, use of follow-up data)
- facilities
- equipment
- materials and supplies
- guidance services
- placement services
- sex equity activities
- access to special populations
- additional services to special populations

Program Information

- curriculum
- learning/teaching resources
- educational resources
- instructional context

Student Information

- recruitment
- selection
- financial aid
- activities
- oranizations
- achievement
- placement
- follow-up

Staff Information

- qualifications (experience, training)
- professional development

Community Information

- community resources
- community relations
- LACVE involvement

The timing of the internal reviews reflects the use to which they are put. As they are primarily seen as preparatory to on-site visits, they are most often undertaken just prior to external reviews. The external reviews are usually scheduled, as mandated, once during the five-year period of the state plan; internal reviews are generally conducted in conjunction with them. Many states have only recently implemented their review procedures, though, and to review 100 percent of their programs within the first five-year cycle has necessitated reviewing as many as one-third of them each year for three years.

External Review

External reviews are uniformly conducted across our sample. Such assessments characteristically involve a team from outside the district participating in an on-site visit for several days. Even the two states in our sample which do not have a coordinated review procedure have site visits conducted independently by a number of state agency staff.

External review team members represent a wide range of constituencies. Consultants and area specialists from the state level are most commonly included in the teams. State advisory council members are encouraged to participate and/or observe reviews in most states, though they are identified as regular participants in only six of the reviewed states. Teacher-educators are team members in six states as well. Finally, most states have some provision for local representation to on-site reviews. These include local school personnel (again from outside the reviewed district), students and graduates of the programs, local employers, representatives of business and industry, and LACVE members.

The size of the visiting team depends on the procedure followed as well as the size of the program(s) being reviewed. Teams of three to five members per program are common. The largest single external review we heard described involved 200 team members to evaluate 41 programs in one school which served both secondary and postsecondary students. On-site visits in our sample states ranged from one to five days, with two or three being typical.

Generally, the state agency assumes the responsibility for putting together a team. Only one state requires the local agency being evaluated to organize this activity. Another state employs two forms of external review:

one is a local program review which is coordinated by the vocational teacher with local administration approval and assistance, and the other is a state-directed review which, as its name implies, is coordinated by the state agency. In a third state, the local education agency is entitled to select one member per team.

All states which have formal internal and external reviews use the internal review results as briefing material for external team members. Some states require that supplementary data (such as the local plan or application or previous evaluations and records including follow-up and community data) be supplied with their self-assessments. These figures, too, are often reviewed by team members before their visits.

In most states, the on-site visitation is viewed as a means of verifying the locally conducted self-study. The team members employ the same procedure followed for internal review, utilize the same forms and, where appropriate, review supporting documents/evidence. A number of states expand on the self-study data by having the external review team members interview local respondents. The interviews tend to address the same issues as the self-review. Input is often sought from a cross-section of local school personnel, students, and community representatives.

Although the primary emphasis of external reviews is on educational inputs and process variables, the majority of states in our sample also include some items on outcomes, either in terms of placement or student achievement. In most cases, the items ask if or how the school district assesses program effectiveness; the responses are used only to judge the adequacy of local evaluation processes. In a few cases, however, the items ask for the results of student achievement and outcome measures; in turn, the answers serve as the basis for the review team's own judgments about program effectiveness.

Topics included in the review are most often stated as standards. While some states fear that using standards too often results in setting maximum rather than minimum criteria for performance, there is clearly a trend in our sample states toward standards.

In keeping with the mandate in the 1976 Amendments that each program be evaluated during the five-year period of the state plan, the schedule of external reviews usually provides for each program being visited once in every five-year cycle. As indicated earlier, many states have only recently implemented their review procedures and to review 100 percent of their programs

during the first cycle necessitates reviewing as many as one-third of them each year for three years. The procedure for selecting sites to be reviewed in a given year varies, though it is often based on logistical considerations or is done arbitrarily. A few states select a more scientific sample. For example, one state seeking to evaluate all of its programs in four years, has taken a 25 percent random sample.

The major difficulty which states are encountering in meeting the requirements of evaluating planning and operational process is finding the resources needed to support the program review system. Having developed these elaborate and comprehensive procedures involving multiple instruments and many participants, state agencies report that they are having difficulty maintaining them. Sampling districts so that not all programs would be visited within a five-year period is one means of easing this burden. Certain sampling is allowed by BOAE policy, according to a memorandum issued on April 24, 1979. The restriction on the sampling procedure is that the sample must be representative so that it can be generalized to the universe of programs in the state.

Relatively few states in our study, however, do not plan to conduct external reviews in all programs in five years; even fewer sample by procedures that appear to meet BOAE requirements. Only two states, both very large, select the sites to be visited through a stratified random sampling procedure, and one of those states also selects sites at the request of the superintendents.

The reason that the BOAE sampling policy is not taken advantage of more frequently may be that the policy is inappropriate to the program review procedure already in use. The policy says:

> [A state] may evaluate programs from an appropriate sample of each type of instructional and legislative purpose program . . . .
>
> For example, each of the six-digit code instructional programs must be evaluated within the period covered in the approved Five-Year Plan. But, if a state is operating 100 auto mechanic programs (a six-digit code) throughout the state, it may design a representative sample of such programs in cooperating LEAs/OERs which would generate reliable and valid statistics for all 100 auto mechanics programs. (Policy Memorandum, BOAE DSVPO, FY 79-2, April 24, 1979)

This policy is inconsistent with, and therefore probably not helpful to, state program review practices on two points. First, it is oriented to the sampling of six-digit programs* when the sample selected for program reviews in fact uses the district or institution (and all occupational programs within it) as the unit of analysis. Even if this inconsistency were resolved by arguing that the sampling of districts is a cluster sampling of occupational programs and thus provides representative examples of each six-digit program, a second inconsistency remains. That is, the policy memo is oriented to selecting a sample which would generate reliable and valid statistics for all programs statewide. In practice, as we describe below, program reviews are conducted primarily to provide feedback to and improvement of programs in individual education agencies and only secondarily, if at all, to generate statewide statistics. In keeping with the goal of individual program development, most states which do not conduct on-site program reviews of all districts with the five-year period of the state plan target their visits not to a representative sampling of all programs but to those districts which are identified as having the weakest program. In one state, this strategy is referred to as review by exception, meaning that external reviews will be conducted only in those districts which reveal deficiencies through internal review procedures.

Correcting Deficiencies: Uses of Program Review

In all states in our sample, the primary use of program reviews is to improve programs in the district being evaluated. There is some use of the program review findings in statewide planning for program improvement and technical assistance activities. Responsibility for monitoring the progress of the program improvement falls upon state specialists, program supervisors, regional planners, and district supervisors. A number of respondents in these categories commented on the usefulness of the program review process in structuring the technical assistance they provide to a local agency. Also the findings are usually reported in the state accountability report as

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*The policy distinguishes between instructional, or six-digit code programs and legislative purpose programs. For ease of presentation, we refer only to six-digit instructional programs here but the arguments apply equally to legislative purpose programs.

required by law. However, because vocational education is predominantly a locally directed program, These statewide uses, appear to be secondary to local program improvement.

Given this emphasis on local program improvement, an important element of the program review process is the means by which review findings are communicated to the district. The first step in the feedback process is usually oral and on-site. External reviews, even when quite formal in content and task, are characterized as means for improving programs, not for finding fault. Team members, consistent with this perspective, are encouraged to interact with local staff members as colleagues and to provide feedback on the spot. The site visit is generally concluded with an exit conference, where the team leader usually presents a brief summary of the team's findings to local representatives. Typically present at such conferences are the local education agency visit coordinator, local administrative personnel, and instructional staff.

A few states have more formal exit conferences. Two states, for example, stipulate that no comments may appear in the final review form or report which are not discussed at the exit conference. In another state, the team leader is expected to make written responses in the presence of the local administrator and/or counselor; the team members conducting program reviews complete their forms in the presence of teachers and follow up with suggestions.

After the oral report to the district, the review team submits its completed instruments and/or final report to the state agency. Here the material is approved, analyzed, and summarized. Following state processing, evaluation results are reported to the appropriate staff and local personnel for implementation of recommendations.

Once the program review findings have been communicated to the district and to the state agency, states vary considerably in the means by which they oversee the program changes dictated by the review and in the sanctions which they impose if corrective action is not taken. In some states, the implementation of changes is informal and left to the discretion of the school district. In one local district, for example, a staff member told us that the district worked to implement those recommendations with which it agreed, but felt free to reject the others.

Other states have developed formal procedures to promote the use of evaluation results. Eight of the 15 sample states require written responses, sometimes within specific time limits. One state, for example, requires the local agency to establish priorities and a timeline for implementation within 12 weeks of receiving the report. Another state requires local agencies to respond within eight weeks.

A few states formally differentiate between categories of response. For example, one state follows a BOAE model and distinguishes between deficiencies (vis-a-vis rules and regulations) and recommendations for quality improvement. The local education agency and the state board must agree on a time frame for correcting deficiencies, while the local agency submits a one-year and long-term statement of proposed action for addressing quality improvement. Another state diferentiates among three types of problems: items critical to instruction and safety, which must be corrected within 30 days; items requiring change of facility or budget for purchase of material and equipment, which must be acted on by May 1; and items that can be implemented at the beginning of the next school year.

States also differ in their requirements for reporting on corrective action. A number of states embed corrective action reports in existing reporting systems; some include their plan for improvement in their local plans and applications; still others submit separate periodic progress reports to the state agency.

Even those states which actively promote the use of evaluation by specifying timetables and requirements for corrective action and by monitoring the implementation of the corrective action plans do not appear to impose strong sanctions for corrective action. The ultimate sanctions available are withholding program approval or funding, but these sanctions are infrequently applied. States prefer to continue to work with districts on a supportive program improvement mode. Thus, program reviews are used to alter and improve programs; they are rarely used to terminate programs or to inform funding decisions.

This emphasis on program improvement, rather than strong sanctions, is consistent with the philosophy and traditional role of the majority of state agencies in our sample. State agency respondents see themselves providing technical assistance and program support, not as enforcers (a distinction

which the anticipation of overseeing compliance with the Office of Civil Rights (OCR) guidelines has made salient). The state agencies' definition of their own role is undoubtedly infuenced by their perceptions of the strength of local autonomy. Programs of vocational education are rarely administered or directed solely by the state. State agencies can withhold state approval and state and federal funding of a program, but they cannot prevent a local agency from offering a program with entirely local funding. Since state staff do not have ultimate authority over program offerings, they feel that, except in extreme cases, they will have a greater, long-term impact through persuasion and assistance than through punitive enforcement.

3.2.2 Student Achievement

The regulations, though not the law, specifically require states to evaluate program effectiveness in terms of student achievement. Suggested measures of student achievement include:

- standard occupational proficiency measures;
- criterion-referenced tests; and
- other examinations of students' skills, knowledge, attitudes and readiness for entering employment successfully. [Regulation 104.402(b)]

Unlike the planning and operational process requirements, this requirement is not consistently implemented at the state level. At the time of our visits, none of the 15 sample states required reporting of statewide, standardized student achievement data in all occupational areas. Instead, state activities, where any existed, typically focused on monitoring local efforts to measure student achievement and on developing materials for and/or methods of assessing achievement.*

State monitoring of local student achievement activities is usually a part of the internal and external program review procedures. At minimum

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*In one-third of the sample states, we have no evidence of formal activity regarding student achievement.

this entails checking that student achievement records exist and are on file. Often the states suggest, but do not prescribe, suitable measures of student achievement: course grades, standard occupational proficiency measures, criterion-referenced tests, competencies certification, and other quantitative measures of student skills, knowledge, attitudes and readiness for entering employment.

Some states are prescriptive of evaluation form but not of content. Thus, part of the on-site program review in one state, for example, is a section entitled 'Results of Student Achievement,' which is to be completed on all students who were enrolled in the program during the previous year. This state requires that locally stated objectives must have measurable outcomes. The evaluator identifies the instrument/ methods used to determine achievement, the percent of students achieving the outcome, and the reason(s) for low rates of achievement. In another state, the local education agencies choose the measures they will employ, establish criteria for mastery, and then report to the state the proportion of students who achieve mastery. This state also permits the local agencies to sample students for the purpose of reporting on achievement.

The emphasis on state monitoring of local achievement tests rather than collecting statewide data appears to result from both technical and philosophical considerations. On the technical side, no widely accepted, standardized measures of student achievement exist in all vocational areas as they do in academic subjects. Measures are being developed, but the process is complex, extremely costly, and far from being completed. Within our sample, at least four states are participating in such development. Two of these states are members of multi-state consortia which are working on vocational achievement measures. The largest of these, V-TECS (the Vocational-Technical Education Consortium of States), involves 45 states. The consortia generally are interested in developing competency-based curriculum materials, which will be valid measures of the duties performed by program graduates. V-TECS is also working on means of evaluating student performance. Further, the consortia provide teachers with curricular materials, course outlines, behavioral objectives, and suggestions for equipment.

The philosophical consideration in measuring student achievement is whether it is appropriate for the state vocational education agency to impose

statewide performance standards. Some state agency staff in at least one state in our sample argue that even if good standardized achievement measures existed, the state would be reluctant to mandate their use or require that vocational students meet common standards. Generally, the content of the curriculum in vocational courses and the testing of student competence in that curriculum is viewed as the responsibility of the local school district.

3.2.3 Student Employment Success

Measures of student employment success deserve special attention because data on the job performance of vocational completers and leavers are highlighted in the 1976 Amendments as the most important indicator of the effectiveness of vocational education. Requirements for measures of student employment success are also included in the mandate for the Vocational Education Data System (VEDS). The regulations suggest four indicators of student employment success:

- rates of employment and unemployment;
- wage rates;
- duration of employment; and
- employer satisfaction with the performance of vocational education students as compared with the performance of students who have not had vocational education. [Regulation 104.402(c)]

In practice, the first three indicators are usually incorporated in one instrument for student follow-up (with duration of employment the least frequently included); and the last indicator is measured in an employer follow-up instrument.

As mentioned in the introduction to this chapter, the Congressional committees which drafted the 1976 Education Amendments were critical of the lack of systematic follow-up studies of vocational program completers and leavers. The 1976 Amendments appear to have had a measurable impact on remedying these problems. All states in our sample collect some form of student follow-up data, though not always employer follow-up data. Generally the data are more formalized than previously, though several states are still in the developmental stages of adopting a statewide follow-up system.

Student follow-up data collection instruments are quite similar across states. At a minimum, the questionnaires seek the following information:

- current employment status
- current educational status
- employer's name and address
- job title
- job duties
- salary (and number of hours/week)
- job's relation to vocational training

Some questionnaires add the following issues:

- permission to contact employer
- source of assistance for placement
- length of employment
- job satisfaction
- quality of training program
- quality of guidance and counseling

Most states rely on mailed questionnaires as their primary means of data collection. These are often followed by second and third mailings to nonrespondents, with telephone follow-up between the last two.

According to BOAE policy, data filed on completers, leavers, (and employers) for the Vocational Education Data System (VEDS) can also be used to satisfy the evaluation requirements on completers and leavers. States which have operating management information systems often use those systems to record their follow-up data, rather than develop a separate system to meet the evaluation requirements.

While the actual collection of the data is generally a local responsibility, states often facilitate the process through the provision of forms and a list of students requiring follow-up. In one state, for example, the schools receive follow-up forms from the state with student names and addresses already filled in. In another state, the state agency is beginning to mail the forms directly to the students. At the opposite extreme of state involvement, one state agency suggests that a two- to three-member committee be formed locally to conduct all stages of the follow-up, from the identification of the survey population to analysis of the returns.

Most states follow up on both program completers and leavers as required by law. Only a portion of the states currently distinguish between leavers with more than, and leavers with less than, 50 percent of the program completed. Most states also follow up all completers and leavers even though BOAE and National Center for Education Statistics (NCES), according to their policy memoranda, permit sampling.

The greatest obstacle to successful follow-up has been poor response rates. Some states indicate that it is difficult to locate many students. As with other evaluation elements, cost considerations and the size of the state also present difficulties.

The uses to which student follow-up data are put are less consistent across states than the procedures for collecting the data. At a minimum, follow-up data are aggregated and submitted to the National Center for Education Statistics as required for Vocational Education Data System (VEDS). Several states also mention that they use follow-up data in preparing state plans and accountability reports though they do not specify what that use entails.

In relation to local education agency operations, the state agency usually sends the follow-up data back to the local agency either in the form of an individual district or institution report, or in a few cases, through the publication of a special statewide follow-up report. Beyond making data available to school districts, however, less than half our sample states indicated that follow-up data are formally incorporated into state-defined procedures for planning or evaluating local programs.

Four states use follow-up data as part of their program review process. In two of these states, the state agency makes follow-up data available to the external review teams, but has no specific guidelines on standards for how the information is to be used. It appears that team members use their own professional judgment in weighing the follow-up data with all the other program review criteria in making recommendations for program improvement. In two other states, the use of follow-up data is tied to specific standards and is used to trigger an intensive program review. In no case is follow-up data used alone to terminate a program. This approach seems appropriate since follow-up data by themselves can signal a problem with a particular program or pattern of programs across the state but do not tell the source of the problem. Low rates of student employment success may indicate that students

are being trained in occupations for which there is no demand, in which case the program should be cut back or redefined. But they may also reflect, for example, the quality of instruction being provided and thus indicate the need for program improvement, not termination.

Several states require local education agencies to use follow-up data in the development of their local plans for vocational programs. One state agency with a sophisticated management information system, for example, generates printouts for each district which display on a single page for each program follow-up data together with the previous year's enrollment and the most current labor market data.

Formal employer follow-up data are collected much less consistently than student follow-up data. Approximately half of the sample states do not have a statewide follow-up procedure at both the secondary and post-secondary levels (three states have it at one level but not the other). There is less agreement among vocational educators that employer follow-up, as opposed to student follow-up, is an important and necessary indicator of vocational program effectiveness. At least one state in the sample does not plan to do employer follow-up because they have data which show that employer follow-up is highly correlated with student reports of employment success. Given this strong relationship, the state argues, separate measures of employer satisfaction are duplicative.

Where they are used, employer follow-up instruments are quite similar across states. They typically address the following issues:

- technical skills/knowledge
- work attitudes
- work quality
- overall rating of employee
- preparation of employee relative to coworkers without such training

Some forms additionally seek information on the following:

- punctuality
- ability to take responsibility
- ability to work without supervision
- ability to work with others

- reaction to constructive criticism
- ability to follow prescribed procedures
- adaptability to different assignments
- possession of basic reading, verbal, and math skills

As with the student follow-up, employer data collection relies primarily on mailed questionnaires.

The responsibility for data collection again falls mostly to the local agencies, with the state agencies facilitating the process in varying degrees by providing forms and names of students to be followed. At one extreme in our sample, one state agency mails the questionnaires to employers directly from its offices. At the other extreme, another state agency suggests that a two-member local committee be formed to conduct the entire follow-up.

Poor response rates, identified as a key obstacle to student follow-up, are exacerbated for employer follow-up. Since the names of employers to be followed are obtained from the completed student follow-up forms, the extent to which students do not respond or to the extent that the set of respondents is biased, the sample of employers is restricted.

The problem is further compounded in those states where the Buckley Amendments and rights of privacy are applied. Not all states agree that student privacy laws apply to follow-up, but in those states which require the permission of students and/or parents to contact employers, the sample of employers followed is obviously further restricted to those who have given permission. One state in our sample feels that the need to obtain permission for contacting employers prohibits the administration of employer follow-up from the state level. An additional problem is the reported reluctance of many employers to provide the information requested because of a fear of being legally implicated in some way.

The use of employer follow-up information is less extensive than for student data. States report using the information to provide evidence and documentation of the results of vocational education, to develop state and local plans, and to determine which programs to support.

3.2.4 Additional Services to Special Populations

The fourth area of evaluation specified in the regulations is the results of additional services to special populations. These results are to be measured by the evaluation criteria discussed above under planning and operational processes, student achievement, and student employment success. The special populations identified in the regulations include:

- women
- members of minority groups
- handicapped persons
- disadvantaged persons
- persons of limited English-speaking ability

The primary vehicles for evaluating services to special populations are the program review procedures used by the states to examine planning and operational processes. All sample states that engage in formal review procedures include items concerning special populations, though not all states address all populations. Further, the extent of detail in the review varies considerably among states. The treatment given to special populations is often minimal, consisting of questions such as:

- Are supplemental services provided for the disadvantaged and handicapped?
- Are instructional materials nondiscriminatory in terms of sex, race, or ethnic origin?
- Is placement support nondiscriminatory in terms of sex, race, or ethnic origin?

Some states in our sample do earmark special populations for more extensive treatment in terms of both extensiveness and specificity. One state, for example, includes as part of its review procedure a section dealing with additional services for special populations, including extensive coverage of women, members of minority groups, persons of limited English-speaking ability, handicapped persons, and disadvantaged persons. Further, a team member is designated responsible for data concerning the disadvantaged and handicapped. In another sample state, the self-evaluation for secondary vocational programs contains a section devoted to special services for disadvantaged and/or handicapped students. The instrument looks in detail at placement and programming of handicapped students in vocational classes, meeting the needs of handicapped and disadvantaged students, job placement of the disadvantaged or handicapped student, and program management.

Some states establish standards for acceptable levels of equal access. One, for example, has standards for vocational education which specify that the percentage of women, minority groups, disadvantaged and handicapped, and limited English-speaking students enrolled in vocational education in the region be the same as their respective percentage living in the region. As regards the elimination of sex bias and sex stereotyping, the standards in this state require that programs with 80 percent or more single-sex enrollment have an active recruitment program to increase enrollment of the other sex. In another state, reasons must be given for programs having less than 20 percent enrollment of either sex.

External program reviews also provide an opportunity for state staff charged with special population issues to participate in on-site visits in many states. As already indicated, one state agency designates a team member to be responsible for information on the handicapped and disadvantaged, while in another state a consultant for these two special populations takes part in on-site visits. In approximately half of the sampled states, the sex equity coordinators (or staff members) participate in external reviews (though in some cases they participate as a general team member and do not focus only on sex equity issues). In some states the sex equity coordinators and special needs program staff conduct their own on-site reviews.

The common element of the attention given to special populations in the program reviews across all sample states is that they focus on access to vocational programs. The evaluation of the results of programs for special populations in terms of student achievement and student employment success is given much less attention, at least in terms of the formal state board evaluation system. In terms of student achievement, the lack of attention probably follows more from the general lack of acceptable measures, as discussed above, than from a particular in attention to special populations. In terms of student employment success, the Vocational Education Data System does not currently require that student follow-up data be broken out by sex, race, ethnic background, and handicap, though such delineation is anticipated. (At present, no breakdown by disadvantage is planned.) Employer follow-up will include sex and race/ethnicity but not handicap or disadvantage. Consequently, many

states do not collect the data needed to judge the employment success of special needs vocational students separately from all students.*

Even in those states where such data are collected, we were able to obtain little evidence as to how the information is used. A few states in our sample report follow-up data broken down by special populations in their accountability reports. One state, for example, reports student follow-up data by handicapped, disadvantaged, and limited English-speaking. Some states publish special follow-up reports and a few include special population breakdowns there. One report on 1977 graduates, for example, breaks the results down by sex. In general, however, states do not report the results of services to special populations systematically. Moreover, we have no information on whether the state agencies send data on individual programs back to the schools and instructors.

Another aspect of the emphasis on access to programs rather than on outcomes is that the evaluations generally focus on all services and do not separate the additional services provided to special needs populations. In some states, the additional services funded under the Vocational Education Act are monitored separately by the state staff responsible for handicapped and disadvantaged programs. In other states, however, the additional services may be evaluated as part of the overall program review process, but receive no special attention.

3.3 VOCATIONAL EDUCATION DATA SYSTEM (VEDS)

One of the important Congressional concerns in drafting the 1976 Education Amendments was the poor quality of information available on vocational education. To remedy this problem, the 1976 Amendments directed the Commissioner of Education and the Administrator of the National Center for Educational Statistics (NCES) to develop a national vocational education data reporting and accounting system. This system, subsequently known as VEDS, was to include information resulting from the mandated evaluations and other

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*Other states, through their own management information systems, do collect data broken down by special populations. One, for example, has sex breakdowns of average hourly salary and employer ratings by Office of Education programs.

information resulting from the mandated evaluations and other information on vocational:

- students (including information on their race and sex),
- programs,
- program completers and leavers,
- staff,
- facilities, and
- expenditures. (Regulation 104.116[b])

In keeping with the Congressional desire for a national data base, the key element of VEDS was that data were to be standardized and, therefore, comparable across states. The regulations which implemented the 1976 Amendments specifically required states to use the VEDS' information elements and uniform definitions to assure that the data were compatible and could be aggregated and reported for all states. The 1976 Amendments also required that VEDS be compatible "insofar as possible" with the occupational information data system developed by the National Occupational Information Coordinating Committee. (The activities of the State Occupational Information Coordinating Committees [SOICC], responsible for implementing the system, were described in the chapter on planning.)

The 1976 Amendments initially called for a reporting system to be in full operation by October 1, 1978. However, subsequent technical amendments delayed this date and the system is still under development. All states are now providing some data to VEDS, but many do not meet all data requirements.

The system has met with considerable resistance from the field since inception. Initially the most focal opposition came from state vocational education staff and secondary administrators. More recently, the strongest objections have come from community college administrators who argue that the current VEDS requirements are inappropriate for postsecondary vocational education. At both the secondary and postsecondary levels, state and local administrators in our sample expressed concerns about VEDS in three areas: (1) the burden imposed by VEDS requirements; (2) the quality of data submitted; and (3) the uses to which the data are put.

The issue of burden stems from the extensiveness of the data collection effort involved in meeting VEDS requirements. The data required are extremely detailed. For example, the program enrollment and termination

reports call for numbers of students broken down by instructional program listed by six-digit Office of Education code (e.g., 01.0100, Agricultural Production), level of instruction, racial/ethnic designation, and program completion status. In addition, the forms specify two categories of disadvantage and 12 categories of handicapped which were not to be filled in for the 1979-80 school year but will be required in the future. Some vocational program administrators are particularly concerned about reporting by six-digit codes and by type of handicap. In both cases, their objections are based not only on the difficulty of collecting these data but also on the belief that the detail is inappropriate. For example, in rural districts, programs correspond more closely with two-digit program clusters than with the six-digit program codes. In addition, the data required are extensive because they must be collected every year as opposed to every three or five years; with the exception of follow-up data, these statistics must be reported on all students and staff, not just a sample.

Not suprisingly, the largest burden in meeting VEDS requirements fell on those states which did not have a state management information system or student reporting system already in place when VEDS was created. Most of the states in our sample did have an existing system at the secondary level, but not all did, and several more states had no statewide system at the postsecondary level. In these latter cases, the individual community colleges had their own reporting systems which were not compatible with each other. Meeting VEDS requirements in these states, then, entailed the development of a whole new reporting system.

Even those states which had operating (and in some cases, sophisticated) management information systems in place before VEDS reported that meeting VEDS requirements necessitated substantial changes in their systems. For example, some states have changed from data aggregated at the class or district level to individually based data. Many states have had to collect new types of information. Others have had to apply more detailed breakdowns to enrollment figures. Some states have had to expand their data base to new populations including program leavers, the handicapped, and disadvantaged. At the postsecondary level, different units of accounting must be resolved. In those states with separate secondary and postsecondary systems changes have been needed in both systems.

Postsecondary institutions argue that the VEDS requirements impose a particular burden because they are not compatible with the requirements of the Higher Education General Information Survey (HEGIS), the federal postsecondary student reporting system. Consequently, postsecondary institutions must submit two separate but duplicative data sets for their vocational programs. The Office of Civil Rights (OCR) survey administered in the fall of 1979 also requested extensive data which duplicated but was not compatible with VEDS or HEGIS. (Secondary schools also had to complete the OCR survey.)

The burden imposed by the extensiveness of the VEDS requirements has been exacerbated by NCES repeatedly changing those requirements. Many of the changes in data elements, formats, and definitions resulted from NCES attempts to be responsive to the states' objections to the early requirements. However, the changes themselves have become a source of difficulty because states have been forced to alter their reporting systems annually and in some cases well into the school year. The chairman of the Postsecondary VEDS Task Force in one of our sample states reports in a paper prepared in January 1980 that "the data items that will be required for the reporting period July 1, 1979, through June 30, 1980, have not been identified." VEDS changes, some of our respondents fear, have also undermined the state agency's credibility with the local agencies by requiring annual changes in the state reporting system through which VEDS data are collected.

The ultimate impact of the changing requirements, however, has been on the local educational agencies and often on the individual instructors within those agencies because they are responsible for the actual data collection. Changes in requirements mean additional resources are needed to learn the new system and to design and implement a revised recordkeeping system. One school district in our sample had much of the required enrollment data in its computerized student record system. One new element, however, required that a district staff member go to a different set of files and by hand transfer the needed information for each student to the computer printout.

Thus, meeting VEDS requirements, state and local officials argue, requires the investment of substantial resources. Given the extensiveness of the data to be collected and the added burden of repeated changes in the requirements, many administrators argue that the cost of providing the data is disproportionately large in relation to the amount of federal dollars they receive. In one small school district in our sample, staff estimated, for

example, that they spent at least two person-weeks completing VEDS forms; the total amount of federal vocational education dollars received by the district in FY 1978 was $24,000. If the federal government is going to require such reporting, vocational administrators argue, they should provide funds to pay for it.

The second area of concern about VEDS is the quality of the data submitted. The Congressional rationale in mandating a national information system in vocational education was to obtain data which would be reliable and comparable. It appears that this intent has not yet been realized. One source of difficulty cited is the lack of clear definitions for all data elements. Such definitions are essential as the basis for the collection of comparable data across districts and states. Yet NCES has not been able to develop definitions which are at once precise and meaningful for all districts. Community college administrators, for example, take exception to NCES' definitions of postsecondary and adult education, and of program completers and leavers, arguing that they produce misleading and inappropriate data from community colleges. The administrators also argue that there is no established standard to measure and identify limited English proficiency, and that the current practice of identifying economic disadvantage from financial aid may not be definitive since the advent of middle-income assistance.

Issues of an acceptable unit of accounting for the financial reports are unresolved because some institutions base the system on full-time equivalents, others on credit units or credit hours. Also postsecondary accounting structures in many states are not compatible with Office of Education codes, two- or six-digit, and cannot accommodate special purpose programs such as day care and work study.

Reporting to VEDS in terms of a different unit than commonly used would require either a wholesale revision of the existing system or the establishment of a duplicate accounting system just for VEDS. Program administrators, particularly in postsecondary institutions which typically have the greatest variation, are understandably reluctant to take either of these steps.

The difficulty of finding operational definitions which are workable for all parts of vocational education appears to stem from the same facts which make standard definitions necessary: the vocational education enterprise is so diverse that the same terms have different meanings in different

locations; developing definitions for key elements which overcome these differences is providing to be extremely difficult. Without workable common definitions, VEDS data are no more comparable than previous data on vocational education.

A related issue is the accuracy of the data in the system. There are some reports that local education staff, given the lack of clear definitions together with what they consider to be the inordinate detail of the data requested, are still forced to estimate rather than give precise counts of some portions of the data they report. Issues of unduplicated counts are still unresolved.

A third area of concern among state and local administrators is the uses to which VEDS data are put. Some states in our sample use portions of the VEDS data extensively. One state uses the data to prepare supply and demand summary reports for regional administrators, to anayze male/female enrollments for sex equity reports to the schools, and for planning and accountability. Another incorporates enrollment and follow-up data on local planning printouts. A third state uses the data for the legislature's budgeting process, to determine manpower needs, for local reports, and for program planning and evaluation. In yet another state, the data are used for determining secondary school reimbursements. Finally, one state, as indicated earlier, uses completion and placement data to calculate a product index which, in combination with other information, triggers a program review by the state director if the data fall below a prescribed level. It is significant, however, that each of these heavy users had an extensive management information system before VEDS, a system which was developed in response to the states' perceptions of their own needs. Thus, those states which appear to be making greatest use of VEDS are in fact using a modification of their own system, not what they see as a federally imposed one.

In contrast with these heavy users, state staff in five states in our sample report that VEDS data were collected only for compliance purposes and were passed on to NCES without being used at the state level.

Apparently, VEDS data are not used in many school districts. The Congressional intent in mandating VEDS, as we have said, was based on the expectations that standardized data were better than informal data. In addition, local administrators would use VEDS data as a basis for their evaluations and

planning processes because the data would tell them who they were serving, and what services they were providing. In fact, the very characteristics of VEDS data which make them attractive at the federal, or even the state level--i.e., that they are standardized and in a form that could be aggregated--may make them less desirable locally.

We said earlier that finding common definitions for VEDS data elements is both necessary and difficult because the vocational education enterprise is so diverse. In achieving standardization, these common definitions may force local agencies to code information into categories which do not fit well with the organization of their system practice. As a result, the data that are recorded for VEDS are not always perceived as being meaningful for local planning or evaluation and consequently are not used.

Another aspect of the issue of using the VEDS data concerns federal uses; this is related to the earlier discussion of the extensiveness of VEDS data requirements. Most of the state and local administrators with whom we spoke acknowledge that BOAE and Congress need national data on vocational education for their policymaking. What these administrators question, however, is whether the information is needed in the detail required by VEDS--in such detailed breakdowns, collected annually, and in most cases on the universe of districts, staff, and students. Several administrators commented that they see no evidence that NCES or BOAE are doing anything with the data they provide. Some people believe, for example, that the detailed breakdowns on special needs populations were added because of pressure from national special interest groups without any clear sense of how the detail would be used in policymaking. State and local administrators are understandably frustrated at having to work so hard to provide data that they perceive as serving no real purpose.

A suggested alternative to VEDS as it is currently defined is that national data on vocational education be collected on a more limited basis; with a limited sample drawn nationally and data collected less frequently than annually.

3.4 STATE ADVISORY COUNCIL EVALUATION RESPONSIBILITIES

The State Advisory Councils on Vocational Education (SACVEs) have two major evaluation roles under the 1976 Amendments. First, they are to assist

the state board in developing plans for state board evaluations, monitor those evaluations, and review the evaluation results in the annual SACVE report. Second, the advisory councils are themselves to evaluate the vocational education programs, services, and activities under the annual plan and present the results of those evaluations in their annual report. The advisory councils in the 15 states in our sample have all carried out both roles to some degree. The extent and style of their actvities vary considerably, however. The major sources of data for our analyses are the latest available advisory council annual evaluation reports in each state, augmented by interviews with council members or staff.

3.4.1 Assisting in the Developing and Monitoring of State Board Evaluations

In part, the mandate for state advisory councils to assist state boards in developing plans for state board evaluations and to monitor those evaluations stems from a Congressional concern with strengthening the role of the councils in the state planning process. Feeling that the state advisory councils had not served in any primary capacity in planning for the provision of vocational education services, both the House and Senate committees moved to remedy this situation, first, by specifying increased involvement for the councils in writing the state plan and accountability report, as discussed in the paper on planning. In addition, however, they specified that the councils "must work with the state boards in formulating the plans for carrying out the local evaluations newly required by the Act." (Section 112[b][2])

An examination of the SACVE reports for our 15 sample states shows mixed results in meeting this mandate. Five councils specifically mention that they were involved in the development of the current evaluation procedures with the state board; two others have presented recommendations for a new system, though it is not clear whether these recommendations have been directly discussed with state agency staff or whether the staff agrees with the council recommendations. But in four states, the council states explicitly that it was not asked to assist the state board in developing an evaluation plan.

This lack of involvement is not unique to evaluation but reflects the general relationship between the council and the state board: Three of these four councils have, in our opinion based on interviews with state agency and

council members, adversarial relationships with the state board and, as discussed in the planning chapter, have little or no input to the states' planning process outside the formal participation required in the 107 Committee. The fourth state not involved in planning for state evaluations does not have an adversarial relationship with the state board but has, in our opinion, little impact on board decisions; like the adversarial states, it has little role in planning other than through the 107 Committee. (In four other states, there is no mention of council involvement in developing evaluation plans, but that may reflect the absence of any development activity in the year reported rather than the lack of council involvement.)

The councils in our sample are more consistent in meeting at least part of the mandate to monitor state evaluations than in assisting in the development of state evaluations. For most councils, the focus of the monitoring activities is the observation of the external team on-site visit component of the program review process. Of the sample states with operating, comprehensive program review procedures, council members or staff in all but two states are invited to participate in the review process.* In most cases, they participate as observers, but in at least three states, council members also function as full members of the review team. Councils in two states report participating in all state program reviews, but more typically, council members attend only a sampling of on-site visits. The councils in our sample vary in the means by which they compile and report the results of their observations. A few councils have very formal procedures through which they review and present their findings to the state board. Most of the councils, however, do not specify in their annual report how they use this information.

Far less monitoring is done of state collection of follow-up and enrollment data than of the program review process, very probably because program reviews in most states are seen as the primary state evaluation activity. In nine states in our sample, enrollment and follow-up data collected by the state board are included in the advisory council report, but the attention is on presenting the data rather than critiquing the procedures for collecting them.

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*One of the two councils which does not attend state board program review visits instead monitors the process through the evaluation reports and other data the state board produce. The other reports that it has not participated in the past but intends to in the future.

The advisory council's third responsibility in relation to state board evaluations is to include a review of state board program evaluation results in the council's annual report. Clearly, the first condition of reviewing results is having access to the evaluation data. It appears that access to state data is a problem in only a few states. The availability of state enrollment and follow-up data to most of the councils in our sample can be inferred from the reporting of those data in 9 of the 15 council reports. The availability of program review results is less clear, but the lack of access is an explicit issue in only three states. Apparently, there is some debate in these states about the confidentiality of the reports on individual schools. In one state, for example, reports on state board evaluations are, by board policy, strictly confidential, and may be made public only by the local board of education.

Although most councils have access to state evaluation results, they do not usually comment critically on those results in their annual reports. In all but four states, enrollment and follow-up data are simply summarized or in some cases merely presented in tables with no accompanying description. There is no analysis of the quality of the data or the conclusions to be drawn from them. In the sample, no council commented on the results of the program review (as opposed to the procedures by which they are conducted).

3.4.2 Evaluating Activities Under the State Plan

The second set of evaluation functions for which state advisory councils are responsible is to "evaluate vocational education programs . . ., services, and activities under the annual program plan, and publish and distribute the results thereof." (Section 105[d][2]) State advisory councils interpret this mandate very broadly. In our sample, all councils evaluate vocational programs in the sense that they include judgments about the quality or value of vocational programs and the state agency's administration of them; the councils also make recommendations for improving vocational education in their annual reports. However, councils vary substantially in the strategies they employ to gather information on which their comments and recommendations are based.

In many instances, the data sources for a council's evaluative comments and recommendations are not specified in its annual report. At least a

portion of the recommendations in each council's report appear to be based on the general experience, personal impressions, and expertise of council members rather than on a formal study or examination of the issues addressed.

Most councils, however, use at least one, and often several, more formal strategies for evaluating vocational programs, services, and activities. Two councils in our sample conduct formal statewide surveys of vocational education. One of these states, for example, mails questionnaires to high school and community college vocational instructors; interviews vocational teachers, administrators, students, and general administrators; and tapes structured group discussions among school personnel. The questionnaires and interviews cover a variety of topics, including:

- the quality of vocational instructions
- the accessibility of vocational programs
- the suitability of programs to student needs, interests, ability
- the preparation for realistic job opportunities
- the adequacy of technical assistance and materials from the state vocational education agency
- the process by which programs are changed and improved
- the impact of federal funds
- the use of manpower data
- the presence of guidance programs and student organizations

More frequently conducted than comprehensive surveys are a limited number of studies of particular topis. Eight councils in our sample mention such studies in the annual reports on topics, including: barriers to sex equity; services to special needs populations; vocational education in private schools; outcomes of vocational education; and impacts on the local economy. One council focuses its entire annual report on two or three limited topics each year; the ninth annual report, for example, examines the state's progress toward serving people with disabilities and toward eliminating sex bias and sex stereotyping. The council believes that in a large state, it has a greater chance of influencing the state agency by focusing its recommendations to a few specific areas than by scattering its efforts broadly. In many cases, councils contract with universities or research firms to carry out these studies rather than undertaking them directly.

Five councils also mention on-site visits as a data source for their evaluative comments. One council used to conduct its own formal program reviews in the local schools, using instruments designed for the council in 1976 by the National Center for Research in Vocational Education. The process was discontinued because it duplicated state agency efforts; also, evaluation by several different organizations was burdensome to the local district. Other councils make fewer and apparently less formal evaluative visits. In some cases, council members use their participation in state agency program reviews as an opportunity for their own data collection.

One council reports that it held a series of briefing meetings between council members and knowledgeable and influential persons on various aspects of vocational education. Very probably other councils hold similar meetings but have not specifically mentioned them in their reports.

Similarly, only a few councils particularly mention public hearings as a data source for their evaluation. However, since all councils hold public hearings, they undoubtedly inform the council members' opinions about the vocational education enterprise in their state.

In addition to collecting their own data on vocational programs, state advisory councils use data collected by the state agency. As mentioned above, nine councils report state evaluation data not only in the context of monitoring state evaluations but as part of their own assessment of the status of vocational education (though in three of these cases, the information is simply summarized and is not commented on critically). In most cases, the analysis of state data augments the council's own data collection efforts. In a few cases, however, the advisory council bases its entire analysis on state supplied data, arguing either that it sees no need to collect separate data, or that it would like to collect its own data but does not have the resources to do so.

In sum, if one interprets the mandate that state advisory councils are to evaluate vocational programs, services and activities under the annual plan to mean, first, that the evaluation involves a formal, scientific methodology and, second, that it covers <u>all</u> programs, services and activities, then the advisory councils in our sample are not complying with the provisions of the 1976 Amendments. If, however, one interprets the mandate more broadly, as the advisory councils themselves do, there is evaluative activity taking place.

Moreover, in all sample states, the councils are involved in systematic data collection or analysis in at least one area of concern to vocational educators. The limitation of formal evaluation studies to one or two areas for formal study seems appropriate, given the relatively limited resources and burden of duplication on local districts.

3.5 CONCLUSIONS

3.5.1 State Evaluation Practices

The first conclusion to be drawn from this analysis is that the state vocational education agencies in our sample are engaging in a considerable amount of evaluative activity, most notably in the areas of planning and operational processes and student follow-up.

Planning and Operational Processes

The most consistently implemented, and according to state agency staff the most important evaluation component in the 15 sample states is the program review process. This high level of implementation is not surprising since the program review process fits comfortably with the technical assistance role which state education agencies are accustomed to engage in with local agencies. Also, while the 1976 Amendments have caused states to become more systematic in this undertaking and to expand reviews to address some new issues, the monitoring of local programs is not new.

The major difficulty which states are encountering in meeting the requirements of evaluating planning and operational process is finding the resources needed to support the program review system. Having developed these elaborate and comprehensive procedures involving multiple instruments and many participants, state agencies report that they are having difficulty maintaining them. BOAE policy allows sampling, which theoretically should ease this burden; however, in practice sampling seems inappropriate to the program review procedure which states are using and therefore is not used.

Student Employment Success

The next most consistently implemented evaluation category is student employment success, particularly student follow-up--the category, which was

given greatest emphasis by Congress and was the most heavily criticized in the House and Senate reports in terms of prior practice. By the school year 1979-1980, 12 of the 15 sample states had in place a statewide system of student reporting. Most states follow up on both completers and leavers as required by the Act.

The problems which arise in meeting federal rquirements for student follow-up data appear to stem from the procedural difficulties of gathering accurate, reliable data which are consistent across districts. The difficulty in gathering high quality data, in turn, results from poor response rates; problems in establishing standard definitions of key data elements together with the lack of conviction that standardized follow-up data are necessary; and from the lack of federal funding to ease the burden which the requirements impose on state and local resources.

Formal employer follow-up data are collected much less consistently than student follow-up data. Approximately half the sample states do not have a statewide follow-up procedure at both the secondary and postsecondary levels. There is less agreement among vocational educators that employer follow-up, as opposed to student follow-up, is an important and necessary indicator of vocational program effectiveness, or that it can realistically be collected. In those states which do collect employer follow-up data, poor response rates are an even bigger problem than they are for student follow-up; the names of employers are obtained from the completed student follow-up forms, and some employers are reportedly reluctant to provide the information requested.

Student Achievement

None of the 15 states in our sample requires statewide reporting of student achievement data in all occupational areas, though a small number of states do have occupational proficiency standards in a limited number of occupations. On one hand, this finding is surprising given the frequent argument that the effectiveness of vocational education should be judged by criteria other than student employment success. On the other hand, the finding is understandable given the lack of acceptable standard measures of vocational student achievement and the philosophical stance in a number of states that student achievement is a local responsibility.

The lack of consistent implementation of this evaluation requirement does not indicate that there has been no movement in this area. Since the 1976 Amendments, most states have tried to systematize the assessment of student achievement to some extent--either by working to develop occupational proficiency standards and criterion-referenced curricula for vocational programs, or designating measurement of school achievement as a local responsibility, with the state monitoring to ensure that the responsibility is kept.

Additional Services to Special Populations

Less attention has been given to evaluating the results of additional services to special needs populations. All sample states which have a formal program review process include some items on special needs populations, though the extensiveness of the review varies. In all cases, the review focuses on access to, rather than results of, vocational programs. The evaluation of results of vocational programs for special needs populations in terms of stuent achievement or student employment success is given much less attention than access in the formal state board evaluation system. The lack of student achievement measures for special populations probably results more from the general lack of acceptable achievement instruments than from a particular disregard for special needs populations. Similarly, since VEDS does not currently require that follow-up data be broken out by sex, race, ethnic background, and handicap, states do not collect these data.

Uses of Evaluation

The results of program reviews are used in all sample states to guide local education agencies in improving their vocational programs. While all states offer technical assistance to local agencies in improving programs, they vary considerably in the means by which they oversee the changes dictated by the review and in the sanctions which they impose if corrective action is not taken. In fact, most states are extremely reluctant to use the ultimate sanctions of withholding program approval or federal funding; instead, the states tend to continue working with the district in a supportive, program-improvement mode.

The use of student follow-up data varies more widely than the use of program review data. At a minimum, the data are aggregated and submitted to

the National Center for Educational Statistics as required for Vocational Education Data System. Most states also distribute follow-up results to individual school districts though they do not necessarily provide guidelines or requirements for local use of that information. Over one-third of the sample states, however, use follow-up more extensively in program improvement through the program review process and in planning. Only one state has used follow-up data to make funding decisions; even that state will probably remove this factor from its funding formula since BOAE policy prohibits the use of program quality variables in distributing funds.

Since data on student achievement, the results of additional services to special populations and, in many cases, employer satisfaction are not collected through a statewide system, such figures are obviously not used by the state agency other than in relation to individual programs when measures are included in the program review process.

Thus, the 1976 Education Amendments have led to considerable activity in state evaluation practices, though perhaps not exactly in the way Congress had intended. First, more attention is devoted to evaluating program quality than effectiveness since the most important evaluation component, according to state agency staff, is the program review process.

Second, evaluation results are used to make decisions about programs, but measures of effectiveness in terms of employment success are not the sole factor on which decisions are based. As with labor market data, follow-up data are taken into consideration along with a number of other factors such as student interest and enrollment in a course. Moreover, with both follow-up and program review data, evaluation results are typically used to revise and improve programs; they are rarely used to terminate programs or inform funding decisions.

Evaluation results, then, are influencing the quality and direction of vocational programs. That this influence has thus far increased, or will in the future increase dramatically, the relevance of vocational education to labor market needs (as was hoped by Congress) is far less certain. The lack of dramatic impact, however, probably results not from any failing in the design of the federal legislation or in BOAE's administration of the law, but from characteristics inherent to the state and local agencies implementing the law. First, vocational education is primarily a locally directed program, and

state agencies therefore have only limited influence over how their evaluation findings are used. Second, constraints and priorities other than formal evaluation findings affect both state and local agencies in their decision making and program planning.

Policy Implications

On final view, we believe that the legislative requirements for state board evaluations in the 1976 Amendments should be retained intact in the new legislation. The current legislation properly emphasizes program effectiveness and mandates one measure, student placement, generally agreed as one legitimate measure of success. At the same time, the legislation is broad enough that states can add other measures of program effectiveness to offset the narrow focus on placement and can also measure program quality. The very fact that program reviews are considered so important suggests that states should be encouraged to continue them. From the state agency perspective, program reviews have had a bigger impact on local programs than other types of evaluations. They are a necessary element in knowing how to change programs in order to improve their effectiveness. Also, even though the focus of the program reviews is on process factors, a number of review procedures include items about local measures of program effectiveness. Thus, the program reviews draw attention to and require accountability in measuring effectiveness even if the state agency does not do it itself. Finally, the program review process is valuable in providing a vehicle for drawing attention to state and federal priorities by addressing particular issues such as planning, evaluation, sex equity, and services to special populations.

Attention should be given to the administration of the law by BOAE (now known as the Office of Vocational and Adult Education, or OVAE), however, to ensure that the burden imposed by the evaluation requirements does not become overwhelming. The regulations should be clarified to distinguish between those elements which are suggested and those which are required. OVAE should be encouraged to continue to allow sampling in all evaluation areas but should alter its sampling policies for planning and operational processes. Since the goal of program reviews is program improvement in individual districts, OVAE should allow the selection procedures to target reviews to the districts most in need of improvement rather than seeking a representative

sample of programs which might miss those districts. Districts could be selected, for example, through nomination by state agency consultants and other staff who regularly visit the schools, or by formal data on enrollment and placement which trigger the review if they fall below a certain level. For those districts which are not selected for a comprehensive program review within a five-year period, the state agency should require a less labor-intensive evaluation strategy such as the self-studies and reporting of quantitative data now used in most states in our sample. Also, OVAE should be encouraged to continue the policies of not imposing common measures of student achievement, planning, and operational processes on the states. It should also provide technical assistance to states in developing additional measures of the results of additional services to special needs populations.

3.5.2 Data Reporting

VEDS, which was intended to provide comparable, standardized data on vocational education at the federal level, is still in its developmental stages.

One of the major problems in implementing the reporting system has been the difficulty, particularly at the postsecondary level, in arriving at common, operational definitions of data elements--definitions which can be clearly communicated to the innumerable local staff members who are responsible for the actual data collection.

A related problem is the accuracy of data entered into the system: People are counted in the wrong categories because of unclear definitions and local staff are forced to estimate figures under certain detailed breakdowns because local recordkeeping systems do not provide actual data for those categories.

Another major problem with VEDS has been the substantial burden it has imposed on the state and local agencies responsible for collecting the required data. Meeting VEDS requirements requires an investment of substantial resources. The 1976 Amendments authorized funds to assist states in implementing VEDS, but the money was never appropriated and states have been forced to absorb the full costs of the system. Some state and local administrators feel that the cost of providing the data is disproportionately large

in relation to the federal financial contribution to vocational education. This feeling is particularly strong when these officials see little evidence that the data they are providing are used at the federal level. Also, the burden of data reporting is exacerbated by demands for overlapping, though not compatible, data from various federal sources such as the Higher Education General Information Survey and the Office of Civil Rights.

Policy Implications

These findings suggest that VEDS should be seriously reexamined, first, to determine whether the collection of standardized, comparable data on vocational education through local reporting and intended for use by federal, state, and local officials is really feasible. VEDS should be reexamined, second, to determine whether the data are needed in such detail and on an annual basis. The examination should look both at the number of data elements and breakdowns required and at the size of the sample on which they are drawn. The key issue in redesigning VEDS is to distinguish between data needed for federal policy making and those needed for state and local decision making. Data required by the federal government for long-range planning and for reauthorization, such as detailed breakdowns of enrollment and placement data by type of student served, should be gathered only once every three or five years and then on a limited sample, rather than universe of programs and students. Data used by state and local officials for management and compliance, on the other hand, should be reported annually, but perhaps should not require such detailed breakdowns. The information should focus, for example, on federal funds expended, the state and local match provided, and number of students served for each Subpart of the Vocational Education Amendments by each eligible recipient. While some description of expenditure and enrollment by program type and student type would be desirable, it should be done in much broader categories than presently required.

3.5.3 State Advisory Council Evaluation Practices

The state advisory councils in our sample all carry out both of their evaluation roles to some degree, though the extent and style of their activities vary considerably.

In relation to state board evaluations, councils vary in the extent to which they assist in the development of evaluation plans. They are more consistent in meeting the mandate to monitoring state evaluations through observations of the external team on-site visit component of the program review process; they vary in the procedures by which they compile and report the results of their observations. Far less monitoring is done of the collection of follow-up of student achievement data.

Advisory councils very broadly interpret their mandate to evaluate the vocational education programs, services, and activities under the annual plan. The criticism made prior to the 1976 Amendments, that council evaluations were unsystematic, continues to apply to the extent that some of the recommendations included in each council's report do not specify a particular formal data source on which the recommendation is based. On the other hand, most councils in our sample do conduct at least one formal data collection or analysis each year. No council in our sample currently conducts a statewide on-site evaluation of local districts in the program review mode because they have judged, appropriately we believe, that such evaluations simply duplicate state efforts and impose too great a burden on the local education agencies. Some councils also analyze data collected by the state agency. Only three councils mentioned that they had difficulty in gaining access. The biggest problem with access to data appears to be with obtaining the program review results from individual schools because of questions of confidentiality.

Policy Implications

We recommend that the legislation dealing with the evaluation responsibilities should be revised to clarify the respective responsibilities of SACVEs and state boards in evaluating vocational education programs. The current legislation can be read as requiring advisory councils to conduct systematic, formal evaluations based on independent data collection in all vocational programs, services, and activities in the state. In our view, this requirement would, first, be unnecessarily duplicative of state board efforts and burdensome to the schools evaluated by multiple groups. Second, a full-scale evaluation of the total vocational system is undoubtedly beyond the scope of advisory council resources. The current practice in many states of selecting one or two issues to examine systematically and independently each year seems preferable. BOAE and the National Advisory Council on Vocational

Education (NACVE) should be encouraged to provide technical assistance to the state advisory councils on conducting such studies.

Following from this recommendation that advisory councils conduct independent evaluations on limited topics, Congress should also consider clarifying the state boards' responsibility in providing data to the councils. Although many councils have been able to obtain state data, those councils which have had difficulty gaining access should have adequate guidelines from which to operate in the future.

OVAE and NACVE should also be encouraged to provide technical assistance to state councils in developing more formal procedures for monitoring the state board evaluations.

CHAPTER 4

COORDINATION OF CETA AND VOCATIONAL EDUCATION

4.1 INTRODUCTION

A major purpose of the Vocational Education Act (VEA), as amended by Title II of 1976 Education Amendments, was to assist the states in improving plans for the use of all resources available to the state for vocational education and employment training. No less than 20 sections of the Act mandated direct cooperation between vocational education and training programs under the Comprehensive Employment and Training Act (CETA). A parallel purpose of CETA, as amended in 1978, was to provide the maximum feasible coordination of CETA plans, programs, and activities with related activities such as vocational education, economic development, and other social service programs. The intent of Congress in these statements of legislative purpose was clearly to assure that cooperation and coordination between the two programs take place and that overlapping and duplicative programs be eliminated.

Generally, we found that most states do comply with the major provisions of the two laws although it was beyond the scope of our study to determine whether the ultimate Congressional intent of eliminating overlapping and duplicative programs has been achieved. The following sections present the results of this coordination study and a brief historical background to the problems which were examined.

4.1.1 The Problem: Lack of Coordination

Close to two decades of development in employment and training programs have come to an end. From these early programs have sprung a lengthy series of programs mostly addressed to the end of bringing the disadvantaged and excluded persons into the mainstream of the labor market. Initially, these programs were justified partly on the basis that the established employment and training agencies--namely, public vocational education and the United States Employment Service--were unable to respond to shifting labor market demands. Vocational education, it was charged, was geared more to the labor markets of 1900 than those of the 1960s, and adult education was primarily

avocational in nature. Administrators of the system, it was said, were lacking in imagination; reluctant to update their curricula and methods of instruction; and oblivious to the accelerating technological change that was occurring in the American economy.

Similar charges were made about the Employment Service, the federal-state system responsible for providing recruitment, counseling and placement services to U.S. employers and workers. The Employment Service, it was said, had accommodated employer preferences for middle-class workers and was unable --or unwilling--to respond to the needs of the poor and disadvantaged.

As a result, new programs and new agencies were established, including Manpower Development and Training Act (MDTA) skills centers, Community Action Agencies, the Job Corps, and a host of community-based organizations. As these programs continued to proliferate, a new problem had been created: a great many agencies were now providing similar services to the same target groups. By 1966, Congress believed that the resulting lack of coordination among agencies at all levels (federal, state, and local) was causing unnecessary duplication and waste. Thus, a new federal priority was created: the need to coordinate.

4.1.2 Early Solutions

In the mid-'60s, the President's Committee on Manpower (PCM) was established to bring about coordination among agencies responsible for the delivery of employment and training services. In 1966, the PCM sent teams into the field in an attempt to promote voluntary inter-agency coordination at the local level. The teams were made up of representatives from the Office of Economic Opportunity, the Department of Labor, and the Office of Education. An outgrowth of the PCM program was the Concentrated Employment Program (CEP) --a forerunner of CETA--which attempted to concentrate federal employment and training programs under an umbrella agency in areas of high unemployment.

Shortly after the initiation of CEP, the Cooperative Area Manpower Planning System (CAMPS) was established throughout the country. Developed by the Department of Labor, the CAMPS system involved the Office of Economic Opportunity, the Economic Development Administration of the Department of Commerce, the Department of Housing and Urban Development, and the Department

of Health, Education, and Welfare. The CAMPS program began in March 1967 and continued until CETA was enacted into law in 1973. Area Manpower Coordinating Committees, composed of the state and local administrators of federal employment and training programs, were convened in 68 labor market areas to draw up comprehensive, coordinated employment and training plans. Committee members were asked to share information to identify the area's major employment and training needs and problems; assess the outlook for economic development; and design employment and training plans which would deploy all available resources in a way that would eliminate duplication and concentrate services in areas of greatest need.

In retrospect, the major accomplishment of these early efforts was to provide useful models for coordination of planning and service delivery. The provisions of the current VEA and CETA legislation contain many of the same structures, e.g., coordinated planning, cross-memberships and financial incentives. Additional outcomes of these early efforts were to raise administrative consciousness of the need for coordination and to demonstrate that coordination is an ongoing, never-ending activity. Similarly, the shortcomings of the former CEP and CAMPS continue today, including (1) the limitations to rational planning where social and political organizations are concerned, and (2) the absence of clearly specified expectations or results of the activities which are referred to as coordination.

4.2 CETA/VOCATIONAL EDUCATION MANDATES

Provisions in the CETA and VEA legislation, as amended, provide three different approaches to improving coordination of federally sponsored education and employment programs: (1) cross-committee memberships on governing boards and advisory councils; (2) CETA set-aside funds to encourage coordination; and (3) CETA set-aside funds for in-school training. This multifaceted approach indicates Congressional intent of ensuring that state and local administrators communicate, plan, and work together; that special efforts be made to identify and remedy barriers to coordination; and that the two programs work together to serve those most in need of employment and training services. The next sub-sections will briefly describe these three requirements for CETA vocational education coordination as found in the two amended Acts.

4.2.1 Provisions for Cross-Committee Memberships

With a view toward bringing about better coordination between CETA and vocational education, the 1976 Amendments to the VEA and the 1978 Amendments to CETA provided for the continuation or establishment of four state-level councils and committees:

- the State Advisory Council on Vocational Education (SACVE)
- the Committee for State Vocational Education Planning (often referred to as the "107 Committee")
- the State Occupational Information Coordinating Committee (SOICC)
- the State Employment and Training Council (SETC)

The first three of these committees were mandated in the 1976 vocational education legislation; the last was established by the CETA Amendments of 1978. Although each of these committees serves multiple functions, a major purpose, according to the House report on the 1976 Education Amendments, was to make certain that state administrators of vocational education and manpower training programs have an opportunity to provide input into the plans and programs of the other and to be informed of each other's activities. This, of course, is a first step in eliminating overlapping and duplicative programs within the state. Thus, both laws mandate that representatives of CETA and vocational education have membership on all four committees.

4.2.2 CETA Coordination Set-Asides

Two sections of the 1978 CETA Amendments set aside funds for use by the governor of each state to improve coordination between state agencies involved in delivering employment and training services. Specifically, the CETA Regulations require that:

- an amount equal to one percent of Subparts A, B and C of Title II CETA funds shall be made available to governors for coordination and establishment of linkages with educational agencies; and

- an amount equal to four percent of Subparts A, B and C of Title II shall be made available to governors for coordinating and special services.*

The purpose of these funds, administered by the CETA state agency, is to provide money to support activities designed to improve coordination among various training and employment programs within each state.

4.2.3 CETA Set-Asides for In-School Programs

The 1978 CETA Amendments provide two major set-asides for in-school programs which are likely to involve state and local vocational education agencies in every state. These include:

- An amount equal to six percent of Subparts A, B and C of Title II CETA funds shall be made available to governors for supplemental vocational assistance in the state;

- An amount equal to 22 percent of each Prime Sponsor's Title IV Youth Employment and Training (YETP) allocation shall be used to serve in-school youth in programs designed to enhance their career opportunities and job prospects pursuant to written agreements between the Prime Sponsors and local education agencies.

Each of these funding sources provides opportunities for CETA and vocational education coordination as well as providing specific target populations with various educational services.** The funds available under the first set-asides (i.e., the six percent funds) are administered by the State Vocational Education Board, while the 22 percent funds are administered by local Prime

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*Section 677.32 of the CETA Regulations, published on April 3, 1979, contain the detailed requirements for these grants. States are also allowed to use up to 15 percent of the funds available for supplementary vocational education services to provide, among other possible uses, for coordination of "programs under this (CETA) Act with existing vocational education programs" (Section 677.39). The language is permissive, however, and few coordinating activities were being sponsored with these funds at the time of our field visits.

**The mandated set-asides for vocational education and in-school YETP programs amount to less than four percent of total CETA funding. This is an important point to keep in mind in examining the impact of these funds on the two systems.

Sponsors. Under each of these set-asides a wide range of educational and supportive services are authorized including vocational education training.

4.3 IMPLEMENTATION OF THE PROVISIONS OF THE ACTS

4.3.1 Committee Cross-Memberships

CETA/vocational education cross-memberships on mandated councils and committees have been implemented in all of the 15 sample states. However, the results of such memberships for improved programs and reduction of overlapping services is not clear. These cross-memberships on councils and committees should have produced some substantive changes in training programs or plans. However, few, if any, respondents in either CETA or vocational education agencies could cite instances where plans or programs were substantially altered due to suggestions by members from the other agency.

Cross-memberships on committees, however, has served to provide a means of direct communication at the higher levels of state administration. In fact, many respondents said that the major role played by both CETA and vocational education councils and committees was to provide a setting for an exchange of ideas and discussion of mutual problems. Thus, respondents who were members of various committees felt that communication had been improved but that programs really had not changed much as a result of the committee memberships.

A major provision for the coordination of these two programs is the State Occupational Information Coordinating Committee (SOICC). The SOICC functions to bring together the agency heads of both programs, as well as to coordinate the types of labor market information used by each in planning programs. We found that the SOICC had met with some success in a number of states. As a coordinating committee, however, SOICC seemed to suffer from the same problems that plague other mandated committees—i.e., high-level administrators felt that the meetings were useful mostly as a communication opportunity and that SOICC activities generally had not resulted in revision of programs or plans.

A few respondents indicated that while the idea of cross-memberships was good in practice, it presented difficulties for the members. For example,

one state director of vocational education was the chairman of the SOICC, a member of both the 107 Planning Committee and the State Employment and Training Council (SETC); and attended meetings of the state board of education and the State Advisory Council on Vocational Education (SACVE). "Once during the period of one week," he said, "I attended four committee meetings and had the feeling I was meeting the same people over and over again." Needless to say, his opinion was that there were too many overlapping committees on which he was expected to serve.

In another state, this duplication of councils and committees had caused a different reaction. While memberships on mandated committees were in place, respondents expressed little satisfaction with the results of these various committees. To remedy this situation, yet another interagency committee was established informally in 1977 and since then has grown to include 27 representatives from five different agencies. We were told that there has been some pooling of resources as a result of this committee's discussions. For example, it was embarking on a series of projects funded by the CETA Governor's Grants to look at four areas of concern to CETA and Vocational Education, including labor market information, job placement resources, counseling, and in-service training. At least in one state, this informal committee, composed of both agency heads and line staff, seemed more effective than all the mandated coordination committees.

In summary, the most valuable benefit of cross-memberships on committees and councils is improved information exchange among a whole host of agency representatives, thus creating a climate wherein coordination might occur. Certainly, if agency representatives are not regularly communicating, the chances for coordinated planning and program operation are very slim.

4.3.2 Coordination Grants

As indicated in the introduction, two provisions are made in the CETA legislation to support coordination activities at the state level. The governor's one percent grant specifically states that the funds should be used for coordination and establishment of linkages with educational agencies. The four percent grant, on the other hand, is far less specific, stating merely that the funds should be used for coordination and special services.

While the four percent regulations do not mention coordination with any specific agency, the regulations governing the one percent grant specifically include coordination of CETA and "education agencies." Although we did not expect vocational education agency administrators to control these funds, we expected that those agencies ultimately affected by coordination efforts would be informed about the kinds of projects and activities which would be funded. As will be seen, this was generally not the case.

The One Percent Grant

There appears to be a good deal of confusion regarding the appropriate use of CETA one percent coordination grant funds. In four sample states, none of the money was spent in FY 1979. The CETA Regulations, however, are clear on the purpose of these funds and allow great latitude in choosing among a number of permissible activities.* Among the activities suggested in the CETA Regulations for one percent funds are the following:

- Providing assistance to Prime Sponsors or educational institutions in the development of agreements between Prime Sponsors and state and local education agencies.
- Establishing mechanisms to increase information exchange between Prime Sponsors and educational agencies.
- Developing and disseminating models of linkages which can be shared by all Prime Sponsors in the state.
- Providing technical assistance to Prime Sponsors and educational agencies.
- Providing information, curriculum materials, and technical assistance in curriculum development and staff development to Prime Sponsors.
- Providing assistance in development of systems for assessment and testing of the educational attainment of participants in Prime Sponsor programs; and
- Providing assistance to eliminate barriers in the edu-educational system which hamper employment and training activities.

*From Section 677.38, The Federal Register, April 3, 1979.

In only two of the eleven states which spent one percent funds were state vocational education agencies recipients of one percent grants; in the remaining nine states, CETA officials found other ways to use the one percent grant. Seldom were we able to obtain detailed descriptions of these programs or obtain reports about these projects. Among the types of activities which were funded with the CETA one percent coordination grant are the following:

- The development of occupational orientation and career counseling information materials to help clients make informed training and job related decisions. These materials were made available to training agencies throughout the state.
- The provision of regional placement officers in educational institutions throughout the state. The placement officers were responsible for recruitment, placement and follow-up for the region.
- The provision of needs assessments, curriculum development for open-entry/open-exit programs, adult basic education courses, and workshops to address coordination problems.
- The provision of staff support for a management coordination project which, in turn, was the result of a research program on coordination funded by means of a four percent grant.

With the exception of curriculum development, we found few activities of the type authoried in the CETA Regulations.

In one sample state, the state education agency was trying to gain access to the one percent CETA coordination funds. This agency had developed a plan which it felt would result in better coordination at the State level and, in turn, result in improved local programs. In this proposal, one percent monies would be used to fund a central coordination unit and to hire field personnel. The field personnel would function as "drummers" assigned on a regional basis to encourage Prime Sponsors and education agencies to cooperate in providing services to CETA-eligible clients. It was hoped that adoption of this model would (1) alleviate some of the friction that had previously occurred between the two agencies, and (2) encourage the sharing of resources at the local level between CETA and vocational education.

The Four Percent Grant

CETA Regulations provide that the four percent coordination funds be used for some 13 different activities, including mandates to: improve the

coordination between state agencies and local Prime Sponsors in the delivery of employment and training services throughout the state; to minimize the duplication of services; and to assist the activities of SOICC. Particular emphasis is placed on improving cooperation between various state agencies and local Prime Sponsors; sharing of facilities and resources; eliminating inefficient and duplicative services; providing for the exchange of information between state and local governments on matters that relate to employment and training planning; supporting model training programs for offenders; and providing for coordinated, comprehensive statewide employment and training programs and services.

In addition to these coordination activities, there are also various research and development activities that must be supported with four percent funds, including: the provision of employment and training services in rural areas; the development of labor market information; the provision of technical assistance to Prime Sponsors; and the sponsorship of model employment and training programs.

Given the fact that the required uses of these funds are numerous and that the funds are limited, it was not surprising to find that few states had used these funds for promoting coordination activities. In nearly all sample states, the four percent funds were used to support programs or research and development efforts rather than coordination activities.

There were exceptions, of course. In one state, four percent funds were used to promote school-to-work linkages and to establish coordination agreements among various state agencies involved in employment and training programs. In another, four percent funds were used to coordinate employment and training programs with job creation and economic development activities; to create linkages between the private sector and local Prime Sponsors; to improve coordination beween labor unions and CETA; to encourage multi-agency planning at the state and local levels; and to create a central clearinghouse for dissemination of information on employment and training programs. A third state used four percent funds to develop and implement a statewide comprehensive coordination plan for vocational and manpower training services. Despite these activities, most states had chosen to fund training programs and research, particularly the development of labor market information, with the four percent coordination funds. In eight of the fifteen states, four percent

was being used to help support SOICC activities, such as developing occupational and career information systems and the analysis of labor market data.

4.3.3 CETA Set-asides for Education and Training

In addition to the provisions for cross-memberships on various councils and committees and set-asides for coordination activities, the 1978 CETA Amendments allocated funds specifically designated to support programs for in-school youth and vocational education. As mentioned, these programs were designed to promote coordination of multiple agencies involved in employment and training as well as to assure specific services to target groups. This section will describe the study's findings on types of activities supported with these funds and the perceptions of both CETA/vocational education respondents regarding the successes and problems of each activity.

The Six Percent Set-aside

Each year the six percent set-aside is transferred from the Department of Labor to the State Board for Vocational Education. These funds must be used to provide vocational education programs for clients in each of the Prime Sponsor areas.* Money passes from the state's education department directly to local education agencies on the basis of a nonfinancial agreement between the local training agency and the CETA Prime Sponsor.** This agreement specifies the number of CETA clients to be served by the training program, as well as detailing the types of programs to be offered.

In the fifteen states we visited, we found the six percent set-aside used for a variety of programs. In one state, the vocational education department entered into nonfinancial agreements on behalf of area vocational-

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*Vocational education is broadly defined in the CETA Regulations, Section 677.39, and includes a variety of educational and supportive services.

**The nonfinancial agreement basically outlines the services which are to be provided by a local education agency for clients of a CETA Prime Sponsor. Since funds are not transferred through this agreement, it is referred to as a "nonfinancial agreement." The state board of education, utilizing CETA funds, provides fiscal support to the local education agency.

technical schools. These centers reserve a number of training "slots" in regular programs for CETA clients and contract with respective Prime Sponsors to provide training programs to meet the Prime Sponsor's needs.

In another state, a three-member staff coordinated the six percent funds for the state. This effort had resulted in approximately 775 CETA clients trained in vocational programs. This staff also managed the in-school youth program (22 percent) monies for the single Prime Sponsor in the state. This Prime Sponsor had a policy of combining the six percent, twenty-two percent youth program monies, and some vocational education funds to operate a skill center for CETA clients. While not all arrangements were as cordial and cooperative as those described above, both CETA and vocational education agency respondents in 10 of our states indicated at least moderate satisfaction with present arrangements for administering six percent programs.

In three of our states, however, the administration of the six percent funds caused strong disagreement between CETA and vocational education. In one state, at the time of field visits in March 1980, there were only 1,500 (out of a projected 3,500) students enrolled in six percent programs. In this state, the vocational education agency had been unsuccessful in negotiating two nonfinancial agreements because of a disagreement over which local agencies would provide training services. This same state had encountered additional problems at the state administration level. In this instance the CETA governing agency was determined to ensure full accountability for six percent expenditures, and was adamant that the CETA agency closely review the state and local administration procedures.

Another state experienced a different set of problems. While nonfinancial agreements had been signed, little money was being spent. According to a number of respondents, approximately $4 million (out of $7.3 million) was carried over each year. To alleviate this problem, the responsibility for approving and monitoring six percent projects was transferred from the vocational education agency to the deputy commissioner's office. A major goal was to prepare and execute a plan to use these funds before the Department of Labor demanded their return.

CETA and vocational education officials differ in their perceptions of the causes of difficulty in administering the six percent funds. Vocational education personnel see the intent of the six percent set-aside as a

a Congressional mandate to make certain that existing delivery systems are used in the provision of vocational education services to CETA enrollees and to discourage the establishment of costly duplicate systems. They frankly admit, however, that this perception is not necessarily shared by Prime Sponsors (especially those in large cities), the state CETA office, the State Employment and Training Council, and the Department of Labor. Vocational education personnel claim that there is very little Department of Labor support for the six percent set-aside; that vocational education has not been accepted as an "equal partner" in the administration of CETA (as it was in the administration of MDTA), and that because of the latter, very little consideration is given to the policies and suggestions of vocational educators. Some administrators are strongly opposed to the "pass through" arrangement which, in effect, makes vocational education accountable to the state CETA office.

In some states, the requirement that one state agency account to another state agency has become a point of contention. State agencies usually have equal status with each other and do not relish the thought of accounting to administrators of equal or lesser rank.

In three states, CETA officials told us they had been held responsible by the Department of Labor (DOL) for poor management of the six percent funds by the state vocational education agency. Thus, CETA staff felt that if they are held responsible by the DOL for the six percent money, then they should have better control of its uses. In turn, this has resulted in attempts by CETA to exercise program review and approval authority, including close monitoring of vocational education and local Prime Sponsor nonfinancial agreements. Some state vocational education administrators objected to the principle, and in a few states, the six percent staff felt these changes had crippled the program with red tape and a mountain of paper.

Another administrative problem mentioned several times was that CETA funds are unpredictable. The State Board of Vocational Education cannot draw CETA funds until the governor's office receives final approval from the Department of Labor on its annual grant application. For various reasons delays in the funding of six percent programs are common. One means used to provide program continuity is to carry over funds from one fiscal year to the next so that first-quarter programs could be started on time. Some CETA

understood the purpose of these carryovers but were, nonetheless, subject to chastisement by DOL because of the excessive nature of the carryovers.

In some states, the inter-agency conflict over the six percent set-aside is, reportedly, a continuation of the controversy which had begun in the mid-1960s between local agencies which receive their funding directly from the federal government and state agencies which are the recipients of the more traditional federal/state funding process. Local Prime Sponsors, like the Community Action Agencies which preceded them, are often suspicious of the traditional agencies, and view the six percent set-aside as merely a political concession to the vocational education system. The fact that sponsors must negotiate with the state to obtain their share of the six percent funds, and that they never see the money, does not make much sense to them. Still, this complaint, while voiced quite often, does not seem to have inhibited the negotiation of agreements in 12 of 15 states we visited.

The question still remains, however: Does the six percent grant increase CETA/vocational education coordination? Obviously, programs are being funded and CETA clients are receiving services in all 15 sample states. In some states, it appears that one result of jointly sponsored CETA/vocational education programs is improved communication and coordination between agencies. In others, while there are CETA programs operating in schools, it is not as clear that a coordination function is taking place.

If the aim of the six percent grant is to make certain that existing deliverers of vocational education services are used and to avoid the establishment of duplicate agencies, local Prime Sponsors should simply be allowed to use the six percent funds to purchase vocational education services directly. Presently, under other CETA programs, the amount of money used by local Prime Sponsors to purchase educational services directly from local schools far exceeds six percent allocations in most states. Many representatives of local Prime Sponsors felt they could administer the six percent funds without the help of state agencies.

The 22 Percent YETP Set-aside

This particular set-aside is part of each local Prime Sponsor's annual allocation of CETA funds. The regulations require that 22 percent of the

Youth Employment and Training Program (YETP) must be used to provide programs for in-school youth pursuant to agreements between Prime Sponsors and local education agencies. For eligible clients, a broad range of services is authorized, including: stipends; basic and vocational education services; counseling; career awareness activities; job placement assistance; and assistance in overcoming employment-related sex stereotyping.

Very little information was available at the state level on the 22 percent YETP set-aside.* Since we made visits to only a few local education agencies and Prime Sponsors, we gathered little information on programs sponsored with these funds. However, the information we did obtain seemed to indicate that in most instances in-school programs were receiving a good deal more than the 22 percent of YETP allocations required by law. Most of these funds were used to provide stipends for in-school students; the schools themselves benefitted from far less financial support than would appear on the face. This is not to say that CETA Prime Sponsors do not purchase educational services with the 22 percent set-aside. We found several instances where both basic and vocational education programs were funded with CETA dollars. This varied greatly, with some local agencies getting no CETA funds (even for work/study or stipends) and others getting very substantial sums to operate special class-size programs or single-student slotted programs and counseling centers.

At one Prime Sponsor, all of the in-school youth set-aside had been used for programs at public institutions. These funds were used for a Career Employment Experience Program which included work experience, transitional services, counseling and career direction. Provision of academic credit at the secondary vocational facility was not an issue (as had been expected in many states); both the Prime Sponsor and the school administrators seemed happy with the arrangement. In another Prime Sponsor area, we found that all 22 percent funds were used to provide stipends for CETA clients receiving training in six percent-funded programs, since the state board could not authorize the use of six percent funds for stipends.

In one midwestern state, the 22 percent monies were used in concert with six percent Governor's Grant funds and local vocational school district

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*Since the state CETA and vocational education agencies are seldom directly involved with the use of the 22 percent funds, we did not expect to get much information from this source. The Governor's Balance of State (BOS) Office usually provides the little information we obtained at the state level.

funds to operate a very popular skill center. Several respondents noted that the skill center served the purpose of keeping potential and actual dropouts in touch with the schools and helped prevent them from "falling further through the cracks" in the educational system. At this skills center, academic credit was awarded to CETA clients in a co-op program which required the same competencies as those attained by in-school students. The CETA coordinator at the school felt this program showed great promise for CETA students who wanted to drop out of school.

In at least three of our sample states the State Department of Vocational Education acted as the administering agency for the balance of state 22 percent youth set-aside. In those states, the balance of state Prime Sponsor had contracted with the state board to provide work experience opportunities for in-school youth. We were told that this involvement of the vocational education agency with the state level CETA agency provided a talking point between these two agencies. This dialogue appears to carry over to decision making regarding use of funds earmarked for coordinated services delivery. In each of these states, the six percent Governor's Grant funds were administered with little difficulty or friction between the state agencies.

Programs supported with the 22 percent set-aside apparently have resulted in coordination of CETA and vocational education programs in some local Prime Sponsor areas and schools. However, it also was evident that some Prime Sponsors have little contact with either local schools or colleges, perhaps due to the sheer number of schools and colleges with which most Prime Sponsors must deal. Few, if any, local CETA respondents felt they were able to work closely with all schools and colleges within their service areas. Every local Prime Sponsor we visited, however, had established a working relationship with at least one or two educational institutions within their service areas. It was these educational institutions, or at least the students from these institutions, that received the bulk of the services funded by the 22 percent YETP set-aside.

4.4 CONCLUSIONS

Coordination in the form of cross-memberships and joint programs is occurring in the 15 sample states. The mandated cross-memberships are

implemented; the governor's coordination grants are being used to promote the mandated activities in some states; and educational services are being provided with the six percent and twenty-two percent set-asides. Despite several problems, the provisions of the Vocatonal Education Act, as amended, are being implemented. It may be, however, due to the very nature of coordination, that coordination can never be fully realized beween two programs as complex and varied as vocational education and CETA.

The major barriers to coordination which were cited by CETA and vocational education respondents usually depended on one's perspective. That is, respondents who were vocational educators identified different barriers than CETA respondents. Vocational educators viewed the most serious difficulties as:

- the late arrival of CETA funds
- turnover of personnel at both the state CETA governing agency and Prime Sponsors
- the cumbersome bureaucracy of CETA
- fiscal reporting requirements of the Department of Labor

Conversely, state and local level CETA officials cited the following:

- the lack of imagination in program direction by vocational educators
- lack of commitment to enrolling disadvantaged clients in programs
- rigidity in scheduling programs

These barriers may be the function of a number of institutional differences. CETA is basically a federal-local program; vocational education (as far as federal funds are concerned) is essentially a federal/state-administered program. Differences in the ages and backgrounds of clients combined with differences in the philosophical orientation of those who administer both programs tend to magnify the problems encountered in administering grants where cooperation is needed. In the three states where significant problems existed in administering the six percent funds, disagreements at the state level were cited as the major problem. Even in states where the six percent programs were working well, many respondents said that the added bureaucratic layer of going through the state board of education for CETA monies was an extra barrier to spending funds at the local level.

In states where the one percent and four percent funds have not been spent for any coordination activities, a lack of direction from the Department of Labor and confusion at the CETA agency over who should administer the funds were most often cited as the prime problems.

Perhaps the major barrier to coordination is that while everybody believes in coordination, nobody wants to be coordinated by somebody else. Since all organizations are concerned with survival, the natural tendency is to resist coordination if one's independence or identity is in jeopardy. Even more important, however, is the fact that the patchwork of federal laws gives responsibility, in some instances, to one agency, and authority to another. It is also evident that the patchwork of regulations segments and separates some program activities which should be unified. Thus programs cannot be started because clients have not been certified and clients cannot be certified because red tape has held up contract approval.

The two laws lack a realistic incentive structure. Instead of rewarding two agencies for coordinating (and thus saving money), the idea seems to be that "you did so well with so little, you can do better with less." The lack of an incentive system which rewards those agencies which coordinate is apparent, but there is a real potential for an agency losing some of its autonomy or resources.

Finally, several administrative aspects of CETA and vocational education agencies seem to interfere with coordination efforts. The incompatibility of agency planning cycles, accounting systems, and the uncertainty of federal funding (especially for programs which are funded on a year-to-year basis, e.g., CETA) vitiate attempts at coordination. States which had problems agreeing on the process for spending the six percent monies are now faced with the addition of one percent and four percent coordination funds; resulting in increased friction between CETA and vocational education.

Policy Implications

The determination of whether the various legislative mechanisms had resulted in elimination of overlapping and duplicative programs, i.e., whether the intended consequences had been achieved, was beyond the scope of this study. Our discussions with state and local administrators indicated, however, that they believe coordination has been improved over the past few

years. The causes of such improvement, however, was generally thought to be interpersonal and organizational factors rather than legislative changes.

Although many problems are identified with the present efforts to coordinate CETA and vocational education programs, it seems that most of the Congressionally mandated mechanisms for ensuring the cooperation of these two systems are having positive effects. Complaints of too many meetings, bureaucratic red tape and incongruent schedules are not unique to this field. They are, in fact, complaints which most of us might make about many aspects of our work and private lives. Few state agencies are facing coordination and cooperation barriers which are viewed as insurmountable.

We recommend the continuation of the present mandates for cross-memberships of CETA and vocational education representatives on various councils and committees, although states should have an option to consolidate some of the required committees into larger ones.

We recommend continuation because these memberships have forced communications and information exchange in some states where none had existed previously. This is no small accomplishment and is, despite claims of too many meetings, the only way of assuring a continuing dialogue between representatives of these and other agencies within the state. Such face-to-face meetings are prerequisite to any form of joint planning or sharing of resources but are not adequate in isolation from other incentives such as joint program operation.

The CETA set-asides for coordination and training appear to be having a positive (albeit limited) impact on both systems at all levels. Although not presently required, it seems that CETA administrators might wish to include representatives of the state vocational education agencies when deciding on how to use the one percent and four percent coordination funds. It seems to us that those who are being coordinated should have some say in how this effort will be carried out. In addition, this inclusion provides another opportunity for joint planning and communication.

Both the 6 percent and 22 percent funds have been used to provide training in vocational education institutions in all sample states. In many states, these programs are exemplary both as coordination mechanisms and as service delivery systems. Despite the difficulties we have identified, both approaches appear to be working reasonably well in all states. We recommend the continuation of these set-aside funds for training and support of CETA clients participating in vocational education programs.

CHAPTER 5

SEX EQUITY

5.1 INTRODUCTION

The 1976 Amendments to the Vocational Education Act (VEA) contain provisions which for the first time require recipients of federal funds to undertake positive measures to eliminate sex bias, sex stereotyping, as well as sex discrimination from their vocational education programs. Prior to 1976, the only federal law to address the issue of sex equity in vocational education in any substantial way was Title IX of the Education Amendments of 1972, which prohibits sex discrimination in all federally aided education programs. Title IX, however, is essentially "negative and prohibitory": it does not call for positive steps to render programs sex-fair or to encourage enrollments by persons of the sex previously underrepresented.*

By including sex equity provisions in the 1976 Amendments, Congress not only reaffirmed its conclusion that sex bias and sex stereotyping were significant educational problems but also acknowledged that positive interventions were necessary to correct them. In 1973 and 1974, several national forums considered the problems of sex equity in considerable detail. Chief among these forums were the 1973 hearings on the Women's Educational Equity Act, and the 1974 House hearings on vocational education. Additionally, the 1974 General Accounting Office report on vocational education identified sex bias and sex stereotyping as one of the barriers restricting access to training and employment.**

In 1975, the House Subcommittee on Elementary, Secondary, and Vocational Education held special hearings on sex discrimination and sex stereotyping in vocational education. Many of the issues raised in these hearings

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*Steiger, JoAnn; Arlene Fink; and Jacqueline Kosecoff, Vocational Education Equity Study, Volume 2, Literature and Secondary Data Review, American Institutes for Research, Palo Alto, California. Where not otherwise referenced, material in this section draws heavily from the detailed discussion of the legislative history of sex equity in vocational education to be found in this footnoted report.

**Comptroller General of the United States, Report to the Congress, "What is the Role of Federal Assistance for Vocational Education?" (Washington, D.C., December 31, 1974), p. 88.

were repeated in the Report and Recommendations of the Secretary's Advisory Committee on the Rights and Responsibilities of Women, issued by HEW.* There were several major points raised in these forums:

- Title IX, which emphasizes sex discrimination, is insufficient to remedy past inequities; legislation to address sex bias and sex stereotyping is necessary.
- Women tend to be clustered in a narrow range of occupations, generally in the lower-paying positions.
- Many barriers exist to prevent or discourage enrollment of students in programs not traditional to their sex, including biased instructional materials and educators' insensitivity.
- Discrimination against females and sex stereotyping in vocational education are critical factors contributing to the concentration of women in lower-paying jobs.
- The educational organization takes the form of a pyramid dominated by men, and has not usually addressed the needs of women.
- Exploratory and corrective actions need to be taken in various areas, including research, curriculum development, and in-service staff training.
- Incentives should be used to accomplish sex equity goals.

The House Committee on Education and Labor concluded that many current practices in vocational education did indeed contribute to the inferior position women held in the labor market (House Report, p. 21). Both the House and Senate agreed that federal legislation was necessary to assist states in eliminating sex bias and stereotyping in vocational education.

In their final version, the 1976 Amendments included a variety of mechanisms to promote sex equity in vocational education. Central among these provisions is the requirement that each state must assign full-time personnel to work toward the elimination of sex bias and sex stereotyping in vocational education. The Amendments also specify nine functions which these personnel must carry out including:

a. creating awareness of programs and activities with remedial effects

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*Steiger, J. M., and S. Cooper, Vocational Preparation of Women. A Report of the Secretary's Advisory Committee on the Rights and Responsibilities of Women (Washington, D.C.: Department of Health, Education, and Welfare, 1975).

b. gathering and disseminating enrollment and employment data by sex

c. providing technical assistance on corrective actions to educational agencies

d. reviewing the state distribution of grants and contracts

e. reviewing all vocational education programs

f. monitoring laws prohibiting sex discrimination in employment practices

g. reviewing and submittting recommendations for the annual program plan and report

h. assisting educational agencies to improve opportunities for women

i. making available reports on activities to various state policy and advisory boards concerned with vocational education as well as the general public [Section 104(b)(1)]

The regulations which implement the law add a tenth function:

j. reviewing Title IX self-evaluations [Regulation 104.75(i)]

From the basic grant, $50,000 is to be reserved annually to support the full-time personnel and to carry out the prescribed functions [Section 104(b)(2)].

The sex equity personnel may be perceived as federally funded change agents mandated by law to perform a broad range of functions. Many of the other requirements in the amended Act may be viewed as mechanisms by which these personnel may extend their efforts, institutionalize sex equity goals and activities within the vocational education system, and demonstrate accountability.

For example, the 1976 Amendments specify that sex equity must be addressed in the overall planning process. The Act requires that five-year plans must set forth in detail policies and procedures to assure equal access to vocational programs by both women and men. Details are to include specific actions to be undertaken, as well as incentives for local agencies to develop model programs which encourage nontraditional enrollments and reduce sex stereotyping. In addition, state plans are to describe a program to assess and meet the needs of displaced homemakers and other special populations, including women and men seeking employment in nontraditional occupations. Both the annual program plan and the accountability report are to contain a description of the results of the planning provisions. Prior to submission to the Commissioner, state plans are to be reviewed by the assigned full-time personnel. [Sections 197(b)(4)(A) and (B); 108(b); 109(b)].

The Amendments also provide for the use of VEA funds to support sex equity. Under the Basic Grant (Subpart 2) states may use funds for support services for women in nontraditional training programs, day care services for children of vocational education students, and vocational education for displaced homemakers and other special populations [Section 120(b)(1) (J, K, L)]. Under Program Improvement and Supportive Services (Subpart 3), states may use available funds to support programs and activities designed to overcome sex bias and sex stereotyping in vocational education through research, exemplary and innovative programs, curriculum development, vocational guidance and counseling, and personnel training (Sections 131-136). Under the Act, all uses of funds are permissive: States may use funds for these purposes but are not required to. The regulations, however, specify that states must use Subpart 2 funds to assess and meet the needs of displaced homemakers, although they do not mandate the level of funding.

The Amendments also address sex equity in specifying the composition of the state advisory council. Each state advisory council must include one or more women with backgrounds in employer and training programs, who are knowledgeable about issues surrounding sex discrimination and sex stereotyping in these programs. Such women must include members of minority groups [Section 105(a)(2)(17)].*

The remainder of this chapter examines the implementation of these provisions in the 15 sample states. The chapter focuses primarily upon the role and functions of the full-time sex equity personnel, for their activity is at the cornerstone of state efforts to reduce and eliminate sex bias and sex stereotyping in vocational education. Since planning and reporting activities are discussed under the ten mandated functions, they are not described in a separate section. The use of funds and implementation of the provisions governing the state advisory council are treated separately; again, effective resource utilization and promotion of support from various interest groups may in fact be seen as methods of extending the change agent's role.

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*Other relevant provisions of the Amendments can be found in the sections on Consumer and Homemaking Education, and the National Advisory Council of Vocational Education. These provisions are not addressed in this paper.

This chapter does not describe changing enrollment patterns by sex. That was the objective of the recently completed American Institutes for Research (AIR) study, which failed to discern marked shifts in enrollment by program by sex. We believe that the early AIR results are not surprising. They were based on data obtained during the 1977-78 school year, less than two full years following passage of the Amendments. The most recent data available from BOAE for purposes of this report were for the 1975-76 school year. Given that the implementation of any system-wide change typically involves a lengthy process, we anticipate few dramatic shifts over that period.

Organizational change theorists postulate a change process involving several stages. Rosenblum and Louis describe the stages of change as follows: (1) readiness; (2) initiation; (3) implementation; and (4) continuation.* Given this multi-step process, even a "simple" educational change may take several years. For example, the implementation of carefully prescribed, validated programs in reading or career education by a single school or school district has been found to take two and one-half years years on average.**

Reduction or elimination of sex bias and sex stereotyping, and concomitant changes in enrollment patterns, are bound to take even longer for several reasons. First, we are dealing with firmly entrenched biases and stereotypes, which pervade not only vocational education, but society in general. Second, there are few, if any, "validated" action programs designed to promote change; one of the early tasks faced by the federally funded sex equity personnel was simply to develop and/or identify such approaches. Finally, we are not talking about changing a limited number of educational institutions, but rather modifying a diversified, "loosely coupled" system.

Our discussion is based upon data obtained from two sources. First, between October 1979 and June 1980, extensive interviews were conducted with full-time sex equity personnel in all sample states. Second, data were drawn from a wide range of available state and federal documents, including five-year and annual program plans for FY 78, FY 79, and FY 80; accountability

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*Rosenblum, Sheila, and Karen Seashore Louis, Stability and Change: Implementation of Innovation in Rural Schools. New York: Plenum Press, 1981.

**Louis, Karen Seashore et al., Research and Dissemination Utilization Project, Final Report, Vol. 2. Cambridge, MA: Abt Associates Inc., 1981.

reports for FY 78 and the sex equity narrative in the accountability reports for FY 79; and SACVE reports for FY 78 and FY 79. Among the other documents reviewed were federal monitoring and reporting instruments and policy memoranda, as well as state policies and review instruments, activity reports and application materials for local agencies.

5.2 THE FULL-TIME PERSONNEL AND THE TEN MANDATED FUNCTIONS

5.2.1 Overview

Under the 1976 Amendments each state wishing to obtain federal VEA funds must appoint staff to work full-time toward eliminating sex bias and sex stereotyping. As noted above, the full-time personnel may be seen as change agents, whose role is well defined by the ten prescribed functions. This mechanism represents a new and different approach for the federal government to encourage states to work toward educational equity.*

Both the newness of the position and the magnitude of the change required make the sex equity position a challenging assignment to fill. There are no precedents for this position within state education agencies. The ten mandated functions cover a broad and complex set of responsibilities ranging from conducting awareness activities for the general public to reviewing the distribution of grants and contracts for the state.

Moreover, the objective of the position--to eliminate sex bias and sex stereotyping--is complex and subtle. Many forms of overt sex discrimination may be reduced or eliminated through legislation and active enforcement efforts, but sex bias and sex stereotyping are less easily erased. The origins of sex stereotyping are deeply woven in our social fabric. Given that such stereotyping may be traced to family, peers, and media influences, some educators do not even view it as an educational problem.

Within the educational setting, there are enormous barriers as well. According to various respondents in our sample states, there are several difficulties involved in promoting sex equity:

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*The only other major federal education legislation which addresses the issue of sex equity, Title IX of the Education Amendments of 1972, does not specify that state personnel be full-time, nor does it mandate that the personnel carry out specific functions, nor that set-aside funds be earmarked for this purpose.

- Local education agencies with comprehensive high schools are more difficult to reach than area vocational schools, although the former contain greater numbers of vocational education students overall. Among the reasons are these:
  - -- There are many more comprehensive high schools.
  - -- These schools do not identify as much with the state vocational education agencies or their mission.
  - -- They have a lower concentration of vocational education students and multiple goals.
- Inservice training opportunities for teachers are often limited due to contractual demands for compensation.
- Unless local employers are under pressure to develop affirmative action plans, there are often few positions open for graduates of non-traditional training programs.
- Educators often face conservative attitudes in the community, particularly in rural areas. In some instances, parents and community members are simply unaware of various non-traditional career options; in other cases, they are openly resistant.
- Teachers, rather than counselors, are often cited by students as "linkers" to jobs. (Teachers often know their counterparts in the local work force.) However, reaching the many teachers in the vocational education system is a far more difficult problem.
- Guidance counselors, while generally aware of sex bias as a problem, often assume a reactive role, helping individual students who seek them out. Due to time constraints and their traditional one-on-one orientation, they do not typically initiate proactive efforts to alter the behavior of students or teachers.
- Students often lack exposure to non-traditional training programs prior to application or program choice time. Thus, their options are severely restricted.

Thus, the full-time sex equity personnel face an enormous challenge in attempting to effect change.

Furthermore, many state agencies did not welcome the addition of this position. The $50,000 set-aside, which must be drawn from the basic grant, represents one more burden on already-tight vocational education budgets. In this context, the full-time personnel must often start by seeking to obtain agency support.

In this section, we will describe various features of the sex equity position in the 15 sample states, highlighting those factors which appear to

enhance effectiveness. Second, we will look at the activities which have been undertaken in each state to fulfill tne ten mandated functions. In examining implementation of these functions, we will consider the strategies used by the sex equity personnel to prioritize their activities and to obtain agency and outside support, the coordinators' perceptions of the usefulness of the functions, and the assistance which BOAE provided.*

5.2.2 The Sex-Equity Coordinator Position

While Congress mandated that the states appoint at least one professional to work full-time on sex equity, it left to the discretion of the states several important factors for establishing the position, including:

- timing of and criteria for selection,
- placement within the state agency structure, and
- support staff to assist the full-time personnel.

We found that states handled these decisions in a variety of ways and that they had considerable influence on the extent of activity undertaken by the sex equity coordinators.

Neither the Act nor the Regulations specifies a date by when the sex equity coordinators were to be hired; however, states were obligated to spend the $50,000 reserved for this purpose within FY 78. Moreover, the five-year state plans which were to be submitted to BOAE before July 1, 1977, were to contain assurances that the full-time personnel had reviewed the plan.** We found that every state had complied with the mandate to appoint full-time sex equity personnel by the end of FY 78. Three of the sample states hired full-time personnel by February 1977; two of these actually signed the five-year

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*States have given their full-time personnel various formal titles. However, the title used most frequently, both formally and informally, is "coordinator." Thus, we use this term in the remainder of this section. All coordinators in our sample were female, although one state formerly had a male coordinator. Therefore, we use the feminine pronoun to refer to the coordinators in our study.

**Most five-year plans in our sample were signed by individuals other than those who were identified by our respondents as the first full-time sex equity coordinators.

plan for their respective states.* The majority of the remaining sex equity positions were filled between September and November of 1977, in time for personnel to be fully involved in activities during FY 1978. Two of the sample states did not hire their full-time coordinators until 1978. With the exception of the latter two states, all the coordinators had been hired in sufficient time to participate in planning activities for FY 1979.

In a majority of the sample states, there has been continuity in the sex equity coordinator position. As of July 1, 1980, seven positions were still staffed by the original coordinators whose length of continuous service ranged from 25 months to over 40 months. Two other coordinators who had each held the position for over 40 months have been recently promoted within their agencies and succeeded by their assistants. An additional two took temporary leaves of absence, and their positions were occupied during their absence. Five states have experienced changeover in sex equity personnel; one of these has had three coordinators. In general, we found that the coordinators who had made the most progress in implementing the Act's provisions were those who had been hired early and had remained continuously in their position.

States varied a great deal with respect to criteria for selection. In most instances, the sex equity personnel had had previous experience in addressing equity issues, albeit not necessarily sex equity. Others, while having no previous experience with equity issues per se, reported that they had played a nontraditional role in their previous positions. Only three of the 15 coordinators in our sample had had no prior professional experience in this area. Slightly over half had prior experience in vocational education, and five came to the coordinator position from within their vocational education agency.

Being perceived as an insider by other agency personnel was identified by several respondents as a key to their effectiveness. For example, the coordinator in a large state that has initiated an exemplary range of activities emphasized that her "inside experience" was critical to identifying and channeling resources. Given that the sex equity coordinator needs agency support to fulfill the mandated outreach activities and to institutionalize sex equity into ongoing planning, monitoring, and review functions, such "insider" status can obviously be of great benefit.

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*The first of our sample states to implement this provision hired a full-time coordinator in December 1976; however, the five-year plan does not include a sign-off from this individual.

Relatedly, another factor mentioned by many coordinators as critical in determining their effectiveness was placement in the agency and access to the state director. Only three coordinators in our sample were located outside the state vocational education agency. Of those coordinators located within their agency, however, only five reported directly to the state director. Five more reported to an assistant director, who in turn reported to the state director. Three reported to an individual below the assistant director level.* As one coordinator said, "having direct access" and "having his [the state director's] support are key to successfully carrying out responsibilities."

In 8 of the 15 sample states, additional full-time professionals have been hired to assist the sex equity coordinator (see Table 5.1). One of the most populous states in our sample has hired three additional full-time professionals, while another large state has hired two. Six sample states, two of which are large states, have hired one additional full-time professional each. Finally, three states have hired part-time personnel to assist the full-time coordinator. Some of these positions are funded from the $50,000 set-aside for sex equity; in other instances, additional VEA funds have been used. Sample states have also used the set-aside to pay the salaries of support personnel. In general, coordinators in large states have hired one full-time clerical worker, while coordinators in small states share clerical help with other state agency professionals. The two large states which have hired two or more full-time professionals have also hired an additional support person.

In addition to supporting personel with the mandated $50,000, states report spending these funds for supplies and services including office materials, dissemination materials, consultants for workshops, and travel for the coordinator. In two of the small sample states, a portion of the set-aside has been used to fund grants for local agencies.

In summary, all sex equity coordinators are now in place; in several states, two or more full-time personnel have been hired to fulfill the mandated sex equity functions. In general, we found, through both analysis and self-report, that the most active coordinators:

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*One state has two full-time sex equity coordinators; one for secondary and the other for postsecondary. In another state, our respondent indicated that in FY 80, her position is scheduled to be moved from outside the vocational education agency to reporting directly to the state director.

Table 5.1

NUMBER OF FULL-TIME PERSONNEL APPOINTED
BY SIZE OF STATE

Size of State**	Number of Full-time Personnel Appointed*		
	One	Two	More Than Two
Large 11,000,000-20,000,000	1	2	2
Medium 3,200,000-6,800,000	3	2	0
Small 730,000-2,600,000	3	2	0
TOTAL:	7	6	2

*Based on interview data.

**State rank by population, based on 1970 Census of Population.

- were hired early and remained in their positions continuously
- were perceived as "insiders"
- were located within the state vocational agency
- had access to the state director of vocational education*

Naturally, if additional staff were available, more activities were accomplished, as well.

5.2.3 The Ten Mandated Functions

Sex equity coordinators are to assist states to eliminate sex discrimination and sex stereotyping in vocational education by performing activities under each of the ten functions shown in Figure 5.1. For purposes of this report, we will discuss the ten functions in two clusters.

The first cluster involves four functions which require proactive efforts and reaching out to various population groups: create awareness (function a); develop and support corrective actions (functions c and g); and disseminate information (function h) This cluster requires the sex equity coordinator to serve as an external change agent, assisting various groups in recognizing possible sex bias and sex stereotyping, and developing and/or identifying effective programs to reduce or eliminate them. These functions may be seen as the first stage in implementation--through them local institutions are encouraged to adopt or adapt remedial measures.

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*Louis, Karen Seashore, "The Role of External Agents in Knowledge Utilization, Problem Solving, and Implementation of New Programs in Local School Contexts," draft version prepared for NIE, Dissemination and Improvement of Practice Research and Educational Practice Program. Cambridge, MA: Abt Associates Inc., 1979, p. 31.

In this review of the empirical literature on external agents, Louis identified status variables as a major set that is perceived to influence the impact of the change agent on the local client. In particular, the review identifies the following: homogeneity with clients; locus; organizational design: single versus team; personal characteristics or attributes. Our findings resemble the first three identified by Louis; our study made no attempt to determine coordinators' personal characteristics.

Figure 5.1

FUNCTIONS OF FULL-TIME PERSONNEL

1. Take action necessary to create awareness of programs and activities in vocational education designed to reduce sex bias and sex stereotyping in all vocational education programs, including assisting the State Board in publicizing the public hearings on the State plan in accordance with 104.165(a);

2. Gather, analyze, and disseminate data on the status of men and women students and employees in vocational education programs of the State;

3. Develop and support actions to correct problems brought to the attention of this personnel through activities carried out under paragraph 2 and 104.76, including creating awareness of the Title IX complaint process;

4. Review the distribution of grants and contracts by the State Board to assure that the interests and needs of women are addressed in all projects assigned under this Act;

5. Review all vocational education programs (including work-study programs, cooperative vocational education programs, apprenticeship programs, and the placement of students who have successfully completed vocational education programs) in the State for sex bias;

6. Monitor the implementation of laws prohibiting sex discrimination in all hiring, firing, and promotion procedures within the State relating to vocational education;

7. Assist local educational agencies and other interested parties in the State in improving vocational education opportunities for women;

8. Make available to the State Board, the State Advisory Council, the National Advisory Council on Vocational Education, the State Commission on the Status of Women, the Commissioner, and the general public, including individuals and organizations in the State concerned about sex bias in vocational education, information developed under this section;

9. Review the self-evaluations required by Title IX; and

10. Review and submit recommendations with respect to overcoming sex bias and sex stereotyping in vocational education programs for the five-year State plan and its annual program plan prior to their submission to the Commissioner for approval.

Regulation 104.75

The second cluster consists of functions which require review or monitoring of various procedures, including: data collection (function b); distribution of grants and contracts (function d); program evaluation (function e); laws governing employment practices (function f); Title IX self-evaluations (function i); and the annual program plan (function j). Most of these functions involve efforts to institutionalize sex equity within the state vocational education system. Through them the sex equity coordinator is given the authority to participate in state planning, monitoring, and funds distribution. The remaining requirement recognizes the need for coordination with Title IX.

While coordinators themselves tend to group their proactive and outreach activities under cluster one, there is no formal consensus.* As will be described in the summary to Section 5.2, at the time of our site visits, BOAE had not yet issued any operational definition of responsibilities under the various functions or guidelines for reporting them.** While a common understanding of appropriate tasks is developing, primarily through coordinators' practical experiences, it is by no means uniform. According to our respondents, such guidance would be most helpful.

In this section, we will describe the implementation of the ten functions in our 15 sample states. Specifically, we will examine the kinds of activities states perform under the ten functions; the strategies used by coordinators to maximize their effectiveness; the priority given to different functions and the ease or difficulty with which they are implemented; and the factors which tend to facilitate or impede coordinators' progress.

Cluster 1: Proactive Efforts

In this cluster, we have grouped the four functions which call for states to initiate proactive effects, including: create awareness (a);

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*Often coordinators report similar activities under three functions: create awareness, and develop and support corrective actions. There is less overlap in reporting functions, classified as cluster two.

**BOAE has provided some feedback, primarily through its monitoring and review activities. No proactive guidance had been given, however.

disseminate information (h); develop and support actions to make programs sex fair (c); and improve vocational education opportunities for women (g).

With one exception, all coordinators gave awareness activities greatest priority for at least the first year in their positions. Coordinators tended to use two strategies to create awareness of the general educational issues surrounding sex bias and sex stereotyping: planning and conducting meetings, and developing and disseminating resource materials.

Meetings were addressed to a wide range of school and non-school target populations. Virtually all states had conducted introductory lectures for state agency staff, and approximately half had also held participatory workshops for their colleagues. All had conducted lectures and/or participatory workshops at the local level. In addition, each coordinator reported conducting awareness activities for the State Advisory Council for Vocational Education, the Governor's Council on the Status of Women, and/or other interest groups, as mandated. Approximately half reported reaching other populations, such as teacher educators, employers, parents, and community groups. Finally, four reported serving secondary student organizations directly.

An important issue faced by the coordinators was identifying and prioritizing the key populations to be served, as well as designing a process for delivering services. All but the two coordinators who are located in postsecondary agencies believed that they must first focus their efforts on the population to which they have greatest access and responsibility: secondary educators. The coordinators attributed their concentration on secondary agencies to four factors:

- They are located in the secondary agency
- Most federal vocational education money is allocated to the secondary agency
- Coordination between secondary and postsecondary agencies is inadequate
- Coordinators believe early intervention (at the secondary rather than the postsecondary level) is preferable

The plans developed in a number of the more sophisticated states included the following target populations and time frame for providing awareness activities and follow-up training:

FY 78: All populations were provided introductory services (awareness activities). Maximum efforts were focused on training a core of trainers, often from state staff, area vocational schools, and/or teacher educator institutions.

FY 79: Maximum efforts were focused on providing follow-up training for state staff and area school personnel, with the assistance of the trainers; introductory activities were extended to comprehensive high schools.

FY 80: Maximum efforts were focused on comprehensive high schools, with the assistance of the trainers.

FY 81: FY 80 priorities are to be continued.

At the time of our visits, states which appeared to have carried out the most extensive activities were in the process of assisting comprehensive high schools to develop action plans.

The second critical issue in providing services at the local level is developing a delivery system. While one coordinator of a small state has been able to provide both awareness activities and follow-up training personally for every district, nearly all coordinators find their states have too many districts for such individual treatment. Moreover, if allowed to, awareness activities could absorb all available time and resources, leaving nothing for other functions. Virtually all coordinators conducted some awareness activities for state and local agencies personally. After the first year, however, many sought ways to delegate the maintenance or extension of this activity. By transferring major responsibility for awareness activities to others, these coordinators have been able to shift more of their own energies to planning and coodinating activities under the other functions.

Coordinators have used a variety of methods to reach various population groups in their states. Some have hired additional full-time personnel, as noted above. Others have sought assistance from existing state agency staff. For example, in two large states, program specialists have been asked to serve on a sex equity task force. In this capacity, these individuals assist the coordinator in providing local staff development as well as technical assistance. By training state agency staff to assist with some of their functions, these coordinators have helped to institutionalize their role within the overall state delivery system.

A number of other states maintain regional networks, training a cadre of individuals who in turn will train their colleagues in local institutions. One large state agency, for example, has trained a cadre of 30 people to assist local education agencies in achieving sex equity in vocational education programs. Cadre members are drawn from throughout the state and include representatives of the State Education Association, Urban League, State Vocational Association, American Association of University Women, and State Career Guidance Centers, among others. Workshops and technical assistance are available from cadre members upon request to the state agency.

Some of these sex equity networks rest almost exclusively on preexisting foundations, adding new objectives and activities to established dissemination/technical assistance organizations and linkage systems. In particular, coordinators have recognized the value of working with regional career guidance centers and guidance counselors in area vocational schools, because of their existing links with local comprehensive high schools. In other instances, coordinators have had to develop networks which did not previously exist within the realm of vocational education--working with teacher educators and various interest groups, for example. A number of states have used funds from Subparts 2 and 3 to support both local and statewide projects. These will be discussed later in this chapter.

In addition to conducting in-person lectures and workshops, the second strategy coordinators use to create awareness is to develop and/or disseminate a variety of print and nonprint materials. Many states have used part of their $50,000 set-aside or earmarked Subpart 3 funds to develop audio-visual aids and handout materials for in-service training sessions. Materials have also been distributed more widely to vocational educators, CETA prime sponsors, directors of special projects, guidance counselors, career educators, and others involved in training, counseling, and employment. The most frequently reported dissemination methods for these professional audiences are:

- resource materials, including handbooks, technical assistance guides, and resource packets (14 states);
- reports on exemplary projects (13 states); and
- articles in vocational education newsletters or journals (9 states).

In addition, some states have developed a variety of methods for reaching students, employers, and parents, as well as the general community.

Approximately two-thirds of the sample states, for example, have attempted to reach these audiences through the local news media, as well as through television and radio public service announcements. Other nonprint media include:

- posters developed by State Apprenticeship Councils designed to encourage females to enter apprenticeship programs;
- student exhibits displayed prominently in public settings depicting the theme of participation in nontraditional training programs;
- billboard advertising arranged in cooperation with local businesses and the state's Outdoor Advertising Association; and
- public service announcements sent through the statewide mailing of utility bills.

Several states have developed films, slide/tapes or video cassettes, some of which are distributed nationally. One state has developed two documentaries on expanding roles for males and females, "Women in a Changing World" and "A Man's Place." Another state's tape cassette on females in apprenticeship is available to any agency for the cost of sending a blank cassette for duplication. As will be described in the summary to Section 5.2, however, to date dissemination efforts have been primarily intra-state in focus. There is a need for more formal information sharing nationwide, so that coordinators can avoid unnecessary duplication of effort and successful programs can be made known to a wider audience.

It is important to point out a general approach which many respondents have found to be constructive. In addition to discussing the need to eliminate sex bias and sex stereotyping, they emphasize to audiences the notion of "expanding sex-role expectations" or "expanding career options." They find this approach to be more positive and more focused on students.

Once awareness has been created, coordinators are responsible for assisting in the change process by developing and supporting corrective actions (functions c and g, respectively).* The activities reported by states for these follow-up functions frequently overlap. Under function c, however, coordinators were more likely to report efforts to assist local districts to

*While FY 78 was devoted primarily to awareness activities, FY 79 involved a greater range of activities listed under these two functions.

develop systematic plans for reducing sex bias and sex stereotyping and encouraging nontraditional enrollments. Activities reported under function g were more likely to relate to special projects funded under Subparts 2 and 3.

Table 5.2 displays the range of activities reported by states under the two functions. The activities reported most frequently were providing in-service training and technical assistance to special projects funded under Subparts 2 and 3, including projects for displaced homemakers. As with awareness activities, coordinators reported spending more time providing in-service training at the secondary level than the postsecondary level. In addition to explaining the Title IX complaint procedure as mandated, coordinators reported training educators to conduct evaluations and develop remedial actions in the following areas: instructional materials, classroom management, guidance, and recruitment practices.

The most active coordinators share one goal: to implement a statewide system of incentives, encouraging or requiring local districts to produce formal action plans which demonstrate positive efforts toward overcoming sex bias and sex stereotyping in their vocational education programs. At least four states in our sample have implemented such a system; two more indicated they are planning such a strategy for FY 80. Three of these four states require local districts to develop equity action plans as part of the long-range plan submitted annually with the district's application for basic grant funds. One large state is phasing in this plan over three years, moving from area vocational schools to large city schools to other comprehensive high schools. Local action plans are subject to review by the sex equity coordinator. An exemplary sex equity action plan developed by an area vocational school in this state contains detailed policies and procedures, including positive efforts to make programs sex fair. The major sections include attention to the following:

- Student services: corrective actions in admissions, recruitment, counseling; support actions to encourage retention of students in nontraditional programs; equal access to student organizations; and programs for special female populations
- Staff: in-service training on issues of sex equity and affirmative action efforts*

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*This district plan calls for cooperation with the state agency job information service, described in the next section.

Table 5.2

TYPE OF ACTIVITY REPORTED UNDER FUNCTIONS C AND G
BY SAMPLE STATES

Type of Activity	Number of States Reporting
Conduct needs assessment for policies, strategies, information, and training:	
• state agency	9
• local districts	7
Provide inservice training to:	
• state agency personnel	13
• local agencies	
- secondary	13
- postsecondary	8
Develop trainers among state agency staff	7
Develop/disseminate guidelines for local districts to develop positive actions	9
Require assurances in local plans of positive actions to overcome sex bias and sex stereotyping	7
Develop and solicit RFPs for discretionary funds under Subparts 2 and 3	15

- Curriculum: review and development
- Local advisory council: composition of membership
- Data collection by sex: on program enrollment, application, and admission rates

An alternate model used by another state is a voluntary incentive system for initiating positive steps at the local level. Points earned increase the percentage of total reimbursement for all of a district's vocational programs. As of June 1979, 41 percent of the secondary local districts had participated in the incentive program in this state.

Finally, as noted above, all states appear to be carrying out activities under function h: make available to key state policy boards and the general public information developed through the ten functions.

Cluster 2: Review and Monitoring Functions

In this cluster, we have grouped the functions which require review or monitoring of various procedures for eliminating sex bias and sex stereotyping including: data collection (b); distribution of grants and contracts (d); program evaluation (e); laws governing employer practices (f); Title IX self-evaluations (i); and the annual program plan (j).

In brief, nearly all states appear to be incorporating sex equity components into their general review and monitoring procedures. However, the specificity of the criteria used and the thoroughness of its application are variable, often in relation to the degree of the coordinator's direct involvement. States appear to have made the most progress with respect to the review of grant and contract distribution (function d) and program review (function e). Fewer activities have been reported under the remaining cluster 2 functions. The following sections will examine each of these activities individually.

Data Collection. All states have traditionally collected student enrollment data by race and sex for each USOE two-digit program code at the secondary, adult, and postsecondary levels. With the introduction of VEDS, most states are now moving toward enrollment by six-digit program code. In addition, most states have analyzed enrollment by sex by local district and/or planning region. States appear to be disseminating data to vocational educators and advisory council members at the state, regional, and local levels,

through regularly scheduled meetings and annual reports. Enrollment data are also used as an aid for technical assistance and monitoring of individual school districts, especially during on-site visits.

Many states have established and disseminated base-line data for an interval, for example, from 1972-1976. They now have the capacity to compare current enrollment patterns with those of earlier years. Six states have funded (in amounts varying from $8,000 to $100,000) studies using Subpart 3 monies to identify the variables associated with unbalanced enrollments. In one case, the State Advisory Council on Vocational Education funded a similar study for $6,500.

Collecting enrollment data at the six-digit program code level is key in analyzing enrollment by sex because data aggregated to the two-digit level may be misleading about shifts in nontraditional program enrollment. For example, an increase in women in agricultural programs may be largely a reflection of an increase in only one area, such as horticulture. Horticulture is a relatively new program and is not as firmly associated with sex role expectations as other, more established agricultural programs. Therefore, increases in women in horticulture programs should not necessarily be interpreted as evidence of increasing nontraditional enrollments. Without six-digit breakdowns, the pattern for the total agriculture cluster might be misinterpreted. Moreover, without placement data, effective monitoring of progress in achieving sex equity goals is not possible. Both the Vocational Education Data System and the Office of Civil Rights currently require reporting of enrollment and/or placement data by sex. To avoid costly duplication, federal and state reporting requirements should be analyzed and unnecessary overlap minimized. Coordinators have also complained that they need more technical assistance from BOAE, with respect to data collection, analysis, interpretation, and reporting.

Distribution of Grants and Contracts. While all coordinators reported that they review the distribution of contracts and grants under Subpart 3, their activity for reviewing the Subpart 2 distribution is uneven. Eleven coordinators indicated that they or their designees review Subpart 2 local applications for sex equity; two more indicated they plan to do so in FY 80. Several coordinators indicated that they use the local application procedure as a vehicle for providing technical assistance and prodding local districts

into action. As one coordinator put it, "I operate on the myth that I can cut funds; in fact, I do not test that myth . . . Instead, I take the approach, 'You can help me to implement these regulations.'" Thus, she uses the review process as an opportunity to initiate technical assistance and staff development.

In reviewing available local application forms for Subpart 2 funding, we find that while they generally require the minimal assurance for compliance with Title IX (along with those for Title VI and Section 504), only half require assurances that active efforts are taken beyond Title IX. As noted above, four states actually require local agencies to produce detailed action plans indicating progress in encouraging nontraditional enrollments and promoting equity.* Activities which these states look for most are: staff in-service, review and revision of curriculum, and recruitment of and support for students in nontraditional programs. Coordinators of these four states report that local districts are generally responsive.

Twelve of 15 coordinators reported reviewing all Subpart 3 applications; three others indicated they were requested to review only selected applications. All indicated that they share sign-off authority on the applications they review, although the actual influence they exert over the process varies. More than two-thirds of the coordinators indicated they provide eligible recipients with technical assistance including written guidelines for application procedures, as well as individual help on application preparation. The process by which state agency reviewers determine awards is of paramount importance to all coordinators. Chief among their concerns are the reviewers' awareness and concern for sex bias and sex stereotyping, and the presence of a point system giving priority to sex equity efforts in the review procedure.

One large state's policy has initiated yet another approach to institutionalizing sex equity in the funds distribution process: Review panels must be comprised of roughly equal numbers of males and females. According to the sex equity coordinator, equal representation of both sexes on the contracts and grants review panels has been a key determinant in the state's allocation of relatively large amounts of funding to projects designed to reduce sex bias and stereotyping.

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*Two more states indicate that local action plans will be required in FY 80.

Program Evaluation. In most sample states, sex equity coordinators participate in a range of activities connected with their state's program review procedures. However, the degree of their involvement and the thoroughness with which states review local programs for sex equity vary considerably. It is noteworthy that in three states which do not incorporate sex equity in the general program review, the sex equity coordinator has initiated her own procedures.

While coordinators usually provide training for state on-site teams to review for sex fairness, their own participation on teams varies inversely with state size. Coordinators of smaller states reported participating in 10 percent to 100 percent of on-site visits; in contrast, coordinators in large states reported making few if any on-site visits. Regardless of their on-site involvement, coordinators generally participate in the state review of the data collected through site visits, as well as in plans for providing follow-up technical assistance to local districts.

Upon examining available program review instruments, we found that all states incorporate at least some minimal inquiry about sex discrimination in programs and services. However, only 9 of the 15 seek data to determine whether districts are initiating active efforts to make programs sex fair and encourage students to enroll in courses nontraditional for their sex. In two more states, the review instrument is being revised to distinguish inquiries concerning sex stereotyping from previously designed items on sex discrimination or special populations. Several coordinators indicated they or assigned review team members use special addenda to review the Title IX self-evaluation and seek evidence of active efforts to promote sex fairness.

Employer Practices. Monitoring laws prohibiting sex discrimination in employer practices appears to be one of the most difficult functions for coordinators to implement. According to its quality review instrument, BOAE assumes that this function applies to the state vocational agency only.* While most coordinators do concentrate on the state level, we find that a few are conducting some activities which include local districts as well.

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*BOAE, Office of Management Evaluation Review for Compliance/Quality, "Outline for Assessing Equal Access to Vocational Education Programs, Staffing and Development Activities," p. 11.

Our review of 1979 accountability reports revealed that four of the sample states reported no activities; two coordinators reported they had done little under this function and nothing systematic; the other nine coordinators reported that their most frequent activity was responding to inquiries from individual state employees as well as from local school districts on relevant statutes and grievance procedures.

In these and other matters, the coordinators worked with state equal employment opportunity officers. Four states also reported participation in more systematic efforts at their state agencies, including: monitoring state quarterly employment reports; revising formal procedures for data collection, job application and filing grievances; and participating in interview and salary review proceedings.

Five states reported local activities under this function, including efforts relating to data collection, analysis, or dissemination. Three of these reported disseminating statewide information on applicable state and federal statutes. In addition, three sample states reported allocating funds to encourage males and females to enter instructional or administrative positions in vocational education which are nontraditional for their own sex.

One sample state has been particularly proactive in monitoring employer practices. State agency administrative units as well as area vocational schools and the largest school districts are required to submit affirmative action plans to the sex equity coordinator. More notable is that this state has moved beyond the compliance mode by committing Subpart 3 funds to establish and maintain a statewide service designed to increase the number of women in administrative positions in vocational education. Essentially, the project consists of a computerized job network information service (Project JNIS) run in cooperation with the state vocational agency and district superintendents. This state has also established administrative internships for women.

As noted above, however, not all coordinators have succeeded in implementing this function. There were several barriers most frequently cited by our respondents:

- State agency superiors have explicitly discouraged coordinators from monitoring employer practices.

- Coordination with state Affirmative Action officers is absent or inadequate.
- Data on hiring, promotion, and especially firing is inadequate or non-existent.

Title IX Self-evaluations. Reviewing Title IX self-evaluations is another function cited by coordinators as difficult to implement. Moreover, several coordinators felt that many Title IX self-evaluations they have reviewed are of limited usefulness because:

- Local districts have not maintained or updated Title IX self-evaluations since July 1979.
- Self-evaluations are oriented toward minimal compliance on sex discrimination.
- Self-evaluations do not deal with sex stereotyping and sex bias.

States report a variety of methods for implementing the review, from on-site visits to state agency desk audits. In four states, coordinators conduct reviews personally as part of their annual effort to schedule on-site visits. Generally, these coordinators complete 15 to 20 visits annually, and use the opportunity to provide technical assistance as well as to monitor compliance efforts. Three others include the Title IX self-evaluation on the agenda of on-site program review teams. The quality of this effort is variable, depending upon the team members' concern and time available for reviewing sex equity. Alternately, three coordinators depend on assurances submitted in local applications, while another reviews the desk audits of her agency's Title IX officer. Two others report no procedures.*

One issue not addressed in this discussion is the state methods of administering the Office of Civil Rights (OCR) guidelines. At the time of data collection, state agencies were developing their implementation plans. Thus, our discussion does not address the matter of possible implications for sex equity coordinators.

Annual Program Plan. While all coordinators signed the state certificate stating they had reviewed and made recommendations on the annual state

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*This function is scheduled for deletion upon the printing of technical amendments in the Federal Register, Summer 1980.

plan in accordance with the federal mandate, the meaning behind this certification is variable. Seven coordinators indicated some participation in general planning activities, including non-voting status on the 107 Planning Committee. Two of these coordinators whose state boards have established sex equity advisory councils reported extensive involvement.*

On the other hand, three coordinators indicated their signature was only a formality, and one claimed the mandate was unrealistic for her agency, since the state plan was developed in fragments and no superior would support her effort to review and make recommendations on other people's sections. In at least one case, federal MERC/Q** reviewers found a noncompliant state in this function because the coordinator had not made recommendations on all parts of the plan. As a result of their actions, she now plays a more active role in the state's planning process.

Congress intended the five-year and annual state plans to include "a detailed description of . . . policies and procedures," as well as "actions to be taken to overcome sex discrimination and sex stereotyping" in all vocational education programs. All coordinators reported that they write the sex equity sections of the state plan and accountability report. In some cases, especially in the two states with state board-appointed advisory councils for sex equity, responsibility for writing this section is shared.

From our study, we found that the level of detail in the five-year plans is greatest in the three states which hired sex equity coordinators by February 1977. In addition, available state plans for FY 79, and especially for FY 80, show an increase in the level of detail overall. Also, the FY 80 plans are more likely to include details for all ten functions. Accountability reports between FY 78 and FY 79 show similar patterns of improvement.

Summary and Discussion

The mandate to conduct activity in all ten functions annually presents a challenging task to states. It appears that nearly three-fourths of the

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*As of Spring 1980, one of these has promoted the sex equity coordinator to a new position in state planning.

**Management Evaluation Review for Compliance and Quality.

states are meeting this challenge: In the 1979 accountability report, 11 of the sample states (versus nine in 1978) reported activities under each of the ten functions. The extensiveness of the activities varies considerably, however, and appears to depend in part on the coordinator's ability to gain cooperation from agency colleagues and/or access to program funds. In turn, activity is strongly influenced by the support she receives from the state director.

Given the enormity of the sex equity coordinator's task under the Congressionally mandated functions, we asked the coordinators in our sample whether they found the detailed specification of their functions as being helpful in accomplishing the overall objectives of eliminating sex bias and sex stereotyping in vocational education. Eleven responded in the affirmative. Their explanations highlighted two factors: guidance and leverage. As one coordinator stated, the ten functions "serve as a good guide and prevent tunnel vision." It would be tempting to concentrate on special projects and not try to change the system, she explained. Moreover, she continued, "they give me the clout to get in [to various parts of the state and local delivery system]." Many coordinators emphasize that because the ten functions are mandated, their state directors have given them the authority to seek cooperation from key personnel across their agencies.

Those coordinators who feel that the functions are not helpful claim they have received little or no support to carry out some of the functions, particularly those for the review and monitoring cited above as missing from accountability reports.

As mentioned previously, there is as yet no formal consensus on an operational definition of responsibilities under the ten functions. Moreover, according to several coordinators as well as personnel at BOAE, a major problem has been how to develop measures of success and accountability. Within the federal agency, one full-time professional (a program specialist for sex equity programs) has been assigned to provide leadership and technical assistance to all the states. However, the position has had very limited funding, relatively high turnover, and has been vacant for many months at critical times. Partly to fill this gap, the National Advisory Council on Vocational Education (NACVE) has undertaken numerous tasks to assist the coordinators, including advocacy and development of resource materials.

Originally, the federal program specialist provided on-site technical assistance to help state coordinators to "prepare for" and "recover from" the federal agency's on-site review process. Since 1979, due to shortage of travel monies, this assistance has been conducted by telephone. A technical assistance package was designed to help coordinators define their responsibilities but to date has not been released. To a large extent, BOAE depends upon outside consultants, especially the federally funded National Center for Research in Vocational Education, to provide resource materials for coordinators to support and develop active efforts. While several coordinators reported that these materials have been helpful, most of the early efforts at defining the various activities required to fulfill the federal mandate were initiated by the coordinators themselves. At the one BOAE-sponsored national conference held in the fall of 1978, the program specialist did help to establish a national coordinators' network, known as the Vocational Education Equity Coordinators (VEEC). Through annual conferences and informal communication, this network has helped promote nationwide dissemination of effective state approaches to sex equity, as well as exemplary local action programs. Finally, a BOAE project grant calling for more formal support mechanisms and scheduled to operate from mid-1980 to 1982 should provide much-needed, if somewhat overdue, assistance.

Although BOAE's leadership role has been limited, the Bureau's oversight functions appear to have helped coordinators and other officials in sample states to understand the federal requirements and to define their functions operationally. Also, BOAE staffers have helped coordinators apply leverage within their state agencies. For example, one coordinator found the MERC on-site review process gave her, for the first time, a benchmark against which she could start measuring her accomplishments. Others reported that the process provided clarification and improved methods for recording achievements. Two coordinators reported that after their states were found out of compliance on several functions, their superiors increased their suport for sex equity noticeably. Quality reviews for equity were initiated in 1980.* In our sample, one has been completed, another is in progress.

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*The quality review for assessing equal access includes comprehensive inquiries to assess state agencies' active efforts to address the needs of the following target populations: handicapped, disadvantaged, males and females in nontraditional programs, and minorities. These reviews are intended to provide technical assistance; BOAE's comments have no force beyond recommendations.

BOAE also provides technical assistance through desk audits, known as the state plan quality reviews. Reviewers of the 1979 plans looked for states not only to fulfill the mandated requirements, but also to commit discretionary funds to sex equity programs. Reviewers provided positive feedback in the form of both commendations for exemplary program features and recommendations for improvement. For FY 79, 11 of the 14 sample states for which data were available received two or more recommendations. The most common recommendations made were to:

- increase incentives,
- provide more details on sex equity coordinator activities,
- provide more details on activities for displaced homemakers, and
- clarify results of activities.

5.3 AUTHORIZATION OF GRANTS AND USES OF FUNDS

In addition to the mandated $50,000 set aside for providing full-time personnel in each state, several other sections of the law either require or permit the expenditure of Subpart 2 and 3 funds to provide services to reduce or counteract the effects of sex role stereotyping and sex bias:

- States must use Subpart 2 funds to assess and meet the needs of displaced homemakers. [Section 197 (4)(B) and 120 (b)(1)(L); Regulations]
- States may use Subpart 2 funds to provide additional support services for women who are preparing for nontraditional occupations. [Section 120 (b)(1)(J)]
- States may use Subpart 2 funds to provide for day care services for children of students in vocational education programs. [Section 120 (b)(1)(K)]
- States may use Subpart 3 funds to support programs to overcome sex bias and sex stereotyping. [Section 130-136]

The following sections discuss our findings regarding the extent to which states have used VEA funds to meet the needs of nontraditional learners and to reduce sex bias and sex role stereotyping. In general, we found that coordinators who appeared to have made the most progress in implementing the mandated functions had also succeeded in using these funds to extend their own efforts as change agents.

5.3.1 Funds for the Displaced Homemaker

The legislation requires states to include in their five-year plans "a program to assess and meet the needs of" displaced homemakers and other special groups, including current homemakers and part-time workers who wish to secure a full-time job; and persons who wish to seek employment in job areas which traditionally have not been considered appropriate for their sex. The program for this population is to include special courses and job placement services for graduates. While the legislation provides that states may use funds for these purposes, the regulations explicitly require states to do so: "The State shall fund programs . . . to assess and meet the needs" of this target population. However, the level of spending is left to the discretion of the states.

All sample states planned to expend federal funds for displaced homemakers in FY 78. Data taken from the 1978 accountability reports and presented in Table 5.3 indicate that slightly more than half the states planned to spend $25,000 or more. Most states, however, were unable to mount programs quickly enough to spend the funds. Six spent 10 percent or less of their planned allocations; another four spent 50 percent or less. Thus it appears that for most states in our sample, FY 78 was a start-up year.*

In seeking to determine why programs had not begun, we received several answers. Some states chose to complete the needs assessment before initiating other programs. Of the nine states where information was obtained, six had completed assessments, and two more were in the process of doing so. Some states required time to develop a distribution process, including the assignment of review and approval functions. Six states have chosen to assign this responsibility to the sex equity coordinator; five others have assigned it to various program personnel within their agencies; and four others have chosen other state agencies. For all, the task represented an added responsibility to previously established workloads. Respondents in one state indicated that displaced homemaker programs had been eliminated in FY 1978 due to a general reduction in the state's total allocation.

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*While complete data on actual expenditures for FY 1979 are unavailable, interview data from our sample states suggest that they are increasing expenditures in this category.

Table 5.3

PLANNED EXPENDITURES FOR DISPLACED HOMEMAKER PROGRAMS
BY SIZE OF STATE, FY 78

Size of State*	Planned Expenditures		
	$2,500-$15,000	$25,000-$70,000	$100,000-$200,000
Large			
11,000,000-20,000,000	0	1	4
Medium			
3,200,000- 6,800,000	4	1	0
Small			
730,000- 2,600,000	3	2	0
TOTAL:	7	4	4

*State rank by population, based on 1970 Census of Population.

Although implemented in different ways, funded programs appear to be meeting the intention of the legislation to provide displaced homemakers and others with training, support services, job counseling, and placement. While most projects are located at community colleges, there are other options, as well. One state has used both federal and state funds to develop eight women's centers in postsecondary vocational institutions as part of a long-range plan to provide services statewide. Another has funded separate projects to serve adult populations through secondary-level area vocational schools. Many projects have developed CETA components. In at least two cases, VEA funds have been used to cover administrative costs.

Although there were many programs in our sample states, one was particularly notable for its evolution of services to displaced homemakers. As in most other states, the state agency had never allocated funds for this population prior to the 1976 Amendments and, therefore, lacked data on their needs. Following an initial needs assessment, a single project was initiated in FY 78 through a competitive award process. Modest in scale, the project began as an adult drop-in center providing a variety of individual and group services. Individual services included comprehensive intake with individual counseling, occupational and interest surveys; and follow-up referrals to area agencies. Group services included workshops, presentations, and a year-long support group. The center also collected and disseminated resource materials related to displaced homemaker concerns. By FY 79, the project served 200 individuals and began to expand its services. It tied into the existing day care center at the regional vocational school, providing day care services at little additional cost. It also recognized the need to secure funds to assist participants in acquiring occupational skills. In FY 80, the program again expanded and succeeded in obtaining $180,000 in CETA funds for stipends to trainees.

5.3.2 Support Services for Women and Day Care

Under the legislation, states may use Subpart 2 funds to provide "support services for women who enter programs to prepare individuals for employment in jobs which have been traditionally limited to men . . . ." They may also use funds to provide "day care services for children of students in secondary and postsecondary vocational education programs." Support services to

be provided are counseling, job development, and job follow-up. The regulations add that funds may be used to increase the number of women instructors in courses which have traditionally enrolled mostly males.

In contrast to the displaced homemaker category which requires some level of funding, a relatively small number of states have committed funds to these two optional program areas. The five-year plans indicate that, in our sample, only five states planned to spend any federal funds for support services for women or day care programs. Of these, the 1978 BOAE reports indicate that only four actually spent VEA funds for either purpose. Figures taken from these reports were used to supply the data presented in Table 5.4 which show that only three states use substantial sums of state or federal funds for either purpose. Interestingly, one state spent considerable state funds for these purposes but no federal funds at all. Even in the other two states, federal funds amounted to a very small proportion of the total expenditures for these purposes.

During our site visits, we asked state administrators why they had not opted to use VEA funds to provide support services for women entering nontraditional programs. Several responded that the target population was already served through federally supported displaced homemaker programs. They pointed to the overlap in the definitions governing each of these populations: The displaced homemaker provision does allow funding for "persons who wish to seek employment in job areas which traditionally have not been considered appropriate for their sex." Combining these two pots of money is viewed by respondents as having practical merit. It is not clear, however, whether the needs of nontraditional students at all age levels are adequately assessed and met under the auspices of displaced homemaker funding. It should be noted that some respondents indicated that state agency personnel objected to a funding category for women only. These personnel prefer to include as well men seeking to enter nontraditional occupations.

One sample state initiated a project illustrative of the range of support services; it is also an example of a state agency serving clients by using funds available from both the Support Services for Women and Displaced Homemaker sections of the Vocational Education Act. Designed primarily to meet the needs of the large number of women returning both to school and the paid work force, the project currently operates eight women's centers across

Table 5.4

EXPENDITURES FOR SUPPORT SERVICES FOR WOMEN AND DAY CARE SERVICES IN SAMPLE STATES, FY 1978

State	Support Services for Women		
	Total	Federal	State/Local
California	$450,121	$30,288	$419,833
Wisconsin	83,932	32,026	51,906
Florida	36,158	0	36,158
Oregon	564	564	0
TOTAL	$570,775	$62,878	$507,897

State	Day Care Services		
	Total	Federal	State/Local
California	$443,792	$23,960	$419,832
Wisconsin	168,830	7,978	160,852
Florida	158,670	0	158,672
Oregon	480	480	0
TOTAL	$771,774	$32,418	$739,356

Source: BOAE, statistical reports for FY 1978.

the state, each located in a state postsecondary vocational technical school. While each center is tailored to the needs of the local population, centers have common objectives:

- to provide assistance in clarifying educational and vocational goals of returning adult students through information, classes, seminars, and referral to existing services
- to sponsor workshops and classes to develop the potential of individuals
- to provide assistance in job-finding skills
- to establish cooperative and referral relationships with existing community services and organizations
- to encourage professional development programs tc overcome sex-role stereotyping
- to establish rapport with public and private employers to encourage open attitudes and non-discriminatory hiring policies in providing vocational options for clients

Although detailed statistical information is not available, the clients served include the following: (1) displaced homemakers who need immediate help, advice, and jobs (30 percent); (2) young women 26 to 34 years, who are looking for new directions and long-term careers (40 percent); and (3) women and men, often vocational education students, having program or personal difficulties (30 percent). Clients range in age from 16 to 60 years and have educational backgrounds which range from high school drop-outs to persons with advanced degrees.

With respect to day care for children of vocational education students, several respondents indicated that despite formal and informal assessments indicating substantial needs, state agencies have not committed funds to this category. Although some states claim local monies are used for this purpose, the funding of these kinds of services is not a high priority at the state level. Two states, however, were enthusiastic about their day care programs. In both states, programs were funded at vocational training institutions which also offered child care in their curriculum. Thus, the child care centers provide the dual function of a training lab for aspiring child care workers and an essential service for children of vocational students. Both respondents indicated that under these circumstances, such facilities cost relatively little to operate.

Thus, in FY 78, the option of spending federal monies on support services for women and day care had little effect on sampled state's actions in these areas. Perhaps even more important, the majority of the sample states spent neither federal nor state funds for these purposes. The reasons for this delay may be at least partly due to the difficulty states have in mounting any new program. Interviews and state documents for FY 79 and FY 80 suggest that funding may have recently increased in these categories, although data are not available from all states and are not fully consistent with BOAE figures.

5.3.3 Grants to Overcome Sex Bias and Sex Stereotyping

Under Subpart 3 of the Vocational Education Act, states may also use federal funds specifically for various projects to overcome sex bias and sex stereotyping in vocational education, in areas such as research, curriculum development, and personnel training. They may fund projects for this purpose under any of the other sections of Subpart 3 (Program Improvement and Supportive Services), as well.

While eight sample states planned to spend Subpart 3 funds for grants to overcome sex bias in FY 78, only six actually did. (The amounts ranged from $10,000 to $600,000, with only three states committing $80,000 or more.) For most states, FY 78 was either a start-up year or a period filled with other priorities. A comparison of planned allocations for FY 78 and FY 80 indicates, however, that the level of planned allocations is increasing, as well as the number of states spending funds in this category (see Table 5.5 for FY 80 plans in sample states).

A few states have planned related projects under other Subpart 3 categories: research (five states) and exemplary and innovative projects (four states), curriculum development (two states), and vocational guidance and counseling (2 states). Thus, in our sample a total of 12 of the 15 states have made plans to use discretionary Subpart 3 funds for sex equity projects.

In addition, some states have funded projects under Subpart 3 in which overcoming sex bias is grouped with other objectives, particularly curriculum

Table 5.5

PLANNED ALLOCATIONS FOR SUBPART 3 GRANTS TO OVERCOME SEX BIAS AND SEX STEREOTYPING BY SIZE OF STATE, FY 1980*

Size of State***	Planned Allocations (in thousands)**				
	$0	$5-20	$35-40	$79-90	$500-600
Large 11,000,000-20,000,000	2	0	0	1	2
Medium 3,200,000- 6,800,000	1	2	2	0	0
Small 730,000- 2,600,000	1	2	1	1	0
TOTAL:	4	4	3	2	2

*Source: BOAE FY 1980 Federal and State Funds, Grants to Overcome Sex Bias and Displaced Homemakers, November 1979, and state plans FY 1978.

**Cell entries indicate the number of sample states in that category.

***State rank by population, based on 1970 Census of Population.

development and vocational guidance and counseling.* Unfortunately, according to some coordinators, the infusion of sex equity into broader projects does not necessarily produce the intended result. For example, through FY 80, one sample state has adopted the policy of not funding projects to overcome sex bias and sex stereotyping directly, in favor of giving sex equity priority in all other categories of funding. Essentially, the state's position is: "Sex equity is everybody's business." The coordinator disagrees: in practice, "Everybody's business is nobody's business." Another coordinator pointed out that without any specially earmarked funds, her status relative to other special interests, and hence her "clout," is diminished.

While the legislation does not provide coordinators with any mandated set-aside for program funds, some states have chosen to use a portion of the sex equity funds under Subpart 3 for programs directly augmenting the coordinator's statewide role. For example, two states maintain trainers representing geographic regions to assist the sex equity coordinator with various outreach efforts.**

In another state, $36,000 of Subpart 3 funds have been allocated each year to the coordinator for the purpose of conducting in-service training statewide. Other states, especially the larger states committing higher amounts of monies, have funded awareness and support projects with regional or statewide impact and the development of numerous multi-media materials for dissemination to various target groups. Larger states have also funded several research projects, especially studies to identify barriers to student selection of nontraditional training programs (see Section 5.2.1 above.

Locally funded projects are typically small and tend to emphasize curriculum development and personnel training as means of reducing sex stereotyping and bias. Although many of these projects appear to be useful and effective, they have yet to be widely publicized or replicated. States have limited resources for disseminating products or reports beyond their own borders. This fact, along with the relative lack of regional or national forums for the

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*In these multipurpose projects, accountability reports do not disaggregate expenditures for overcoming sex bias in vocational education, so no assessment of expenditures can be made here.

**One of these statewide networks was discussed previously in cluster 1.

sex equity coordinators, means that nationwide dissemination of products developed under federal funds is uneven at best. An even more serious problem is lack of necessary technical assistance to assist states in adopting or accepting proven approaches.

5.4 STATE ADVISORY COUNCIL ON VOCATIONAL EDUCATION (SACVE)

The 1976 Education Amendments specify that SACVE membership include one or more women with backgrounds and experience in employment and training programs who are knowledgeable with respect to the special experiences of sex discrimination and sex stereotyping in these areas. Such membership is to include minority women as well [Section 105(a)(2)(17)]. In addition, the composition of the SACVE is to include an "appropriate representation of both sexes," [Section 105(a)(2)(17)] which may be defined as the proportion of women in the population or in the work force of the state [Regulation 104.92(b)(3)].

Using the minimally acceptable criterion for defining appropriate representation of both sexes, i.e., work force figures, we find most SACVEs in our sample states do not meet this criterion. Recent reports from the U.S. Department of Labor, Bureau of Labor Statistics, indicate the nationwide work force is over 40 percent female. Table 5.6 shows the percentage of SACVE membership which is female among sample states.

SACVEs have a broad mandate to evaluate vocational education programs, services and activities under the annual plan, including "programs to overcome sex bias" [Section 105(d)(2); Regulation 104.93(c)]. Two-thirds of our sample states report including a sex equity component in their SACVE evaluation procedures. These reports indicate that five SACVEs conducted independent studies of sex equity including a review of the literature, on-site visits, and interviews; two of these show that extensive efforts were expended on behalf of sex equity.

Of the ten sample states which report advisory council evaluating for sex equity, eight made the following recommendations:

- Increase state services in sex equity, including hiring additional personnel
- Develop more specific evaluation criteria for programs designed to overcome sex bias and sex stereotying

Table 5.6

PERCENTAGE OF SACVE MEMBERSHIP WHICH IS FEMALE
BY NUMBER OF SAMPLE STATES*

Percentage of Council Which is Female	Number of States
41-45	2
36-40	3
31-35	2
26-30	2
21-25	4
15-19	2

*The percentage figures for council membership were calculated from the latest available SACVE Annual Reports; nine from 1979 and six from 1978. A recently published report based upon membership lists from the state advisory council offices shows slightly different figures for FY 79. See Newsletter, the Federal Education Project, Lawyers' Committee for Civil Rights Under Law, Suite 520, 733 15th Street, N.W., Washington, D.C. 20005, July 1980, p. 5.

- Supply data on displaced homemaker needs and projects
- Require local districts to identify specific program objectives in overcoming sex bias
- Encourage the training of instructors in areas nontraditional for their sex

To support sex equity in their states, three SACVEs have sponsored other types of activities, including a statewide conference, a study to determine barriers to sex equity, and development of an audio-visual aid for use with local advisory councils.

In addition to the mandated State Advisory Council for Vocational Education, 9 of the 15 sample states have established advisory councils specifically for sex equity. In seven of these nine cases, the coordinator formed the council; in the other two, they were established by state boards. Regardless of their origins, these councils are perceived as extremely valuable by the coordinators. Those who do not have such councils are more likely to complain of being the "only one carrying out the job," or "owning the issue," or "burning out."

These councils take many forms. In some states, they are comprised of state agency staff who assist the coordinator in reviewing local applications and grants, conducting on-site reviews, providing technical assistance, and overall planning. Other councils are composed entirely of members external to the state agency: representatives of secondary schools, community colleges; or, in one instance, business, industry, and advocacy groups. These councils assist primarily with local awareness and support activities and with state planning. Finally, other councils are comprised of both internal and external members and appear to act primarily as advisors and connectors to other service delivery agencies and resources.

5.5 SUMMARY AND ILLUSTRATIONS

To summarize, the 1976 Vocational Education Amendments contain multiple provisions for overcoming sex bias and sex stereotyping in vocational education, the most important of which is the fully funded sex equity personnel mandated to perform ten prespecified functions. All sample states have hired at least one full-time staff member for sex equity, and all have made progress in fulfilling their prescribed functions. According to data available from

the sample states, factors which appear to facilitate coordinator's effectiveness include: being located within the state agency, continuity in the position, being perceived as an insider, access to the state director of vocational education, and availability of additional staff and other resources.

Those coordinators who have made the most progress in fulfilling the ten functions appear to have recognized the need for prioritizing their activities, developing or making use of existing delivery systems to extend their efforts, and using discretionary funds to further their goals.

A key issue in setting priorities was determining the target population to be served. While states differed in their focus, many concentrated at the secondary level, starting with area vocational schools first and moving to comprehensive high schools thereafter. Some began by working within the state agency, hoping to enlist support from program specialists and other vocational education staff. Others concentrated on advisory councils and interest groups, seeking support from external groups and organizations.

Setting priorities was in part a function of the delivery system coordinators wished to establish. The most effective coordinators recognized the need for finding organizations, groups, and individuals to enhance their efforts. Those seeking to use state agency staff to support their activities focused their early efforts at the state staff level. In other cases, coordinators centered on teacher training institutions, career guidance centers, and/or advisory councils and interest groups, with an eye toward using these organizations, groups, and individuals as part of a larger sex equity service system. Finally, some coordinators developed ad hoc networks of individuals (often called cadres) to help develop and implement awareness and follow-up activities.

The use of discretionary funds was highly variable across states and by funding category. While most sample states had allocated federal funds for displaced homemaker programs, for example, few had allocated such funds for day care services. Again, coordinators seeking to augment their efforts had typically used discretionary funds to support state-level projects and/or local activities.

Activities of coordinators in two large states serve to illustrate the various options open to the sex equity personnel and the alternative paths they may take, depending on state-specific factors. While both states mad-

substantial progress in fulfilling the ten prescribed functions, the coordinator used quite different approaches to effecting change.*

In the first state, the sex equity coordinator was located within the state agency and had access to and the support of the state director of vocational education. On the other hand, her position within the vocational education hierarchy itself was not highly visible, and she did not have authority over or formal linkages with those responsible for other major functions within the state agency.** At the same time, the state had a number of advocacy and interest groups which had been lobbying on behalf of sex equity even prior to 1976. Thus, this coordinator began by focusing her efforts on external targets--local schools and school districts, and advocacy and interest groups.

A delivery system was developed with VEA funds and capitalized on the special circumstances in the state. To serve the local school level, a consortium of ten secondary and seven postsecondary representatives was formed to coordinate a statewide inservice training program. Each county and community college unit designated one male and one female to receive training. The training program consisted of three cycles: Cycle I emphasized introductory awareness sessions; Cycle II provided specific technical assistance; Cycle III prepared participants to be trainers for local sites. As an incentive to participate, districts were reimbursed $40 per person. In 1978-1979, a total of 2,637 school personnel received inservice training. Plans for 1979-1980 indicate further funding is proposed for this project.

In addition, a special project was funded to assist advocacy groups. It provided for the development of handbook and workshop materials on sex bias in vocational education and conduct of inservice training for 1,000 representatives of community organizations.

Another project maintains a sex equity network composed of two representatives at each secondary school and postsecondary institution; state

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*The discussion of these two states is not intended to be exhaustive; each of these states has supported numerous additional projects.

**Partly as the result of SACVE criticism, this situation has recently been corrected and the coordinator's position has been upgraded.

department of education personnel; state agencies concerned with sex equity; interested community-based organizations; and business, industry, and labor organizations. The project provides for publishing a bimonthly newsletter; announcing input meetings on the Annual Program Plan; reviewing and disseminating information on promising curriculum materials and exemplary programs; and providing newsworthy items to the media.

In addition, a number of other projects have benefitted from federal funding, including some with activities that will complement and extend the work performed under the statewide training and network projects. The first targets are sex-typed programs in community colleges. With the assistance of seven geographic consultants, regional colleges will identify programs that enroll 80 percent or more of one sex. Faculty of those programs will attend workshops to assist them in recruiting, retaining, and placing the nontraditional student. The second targets are sex-typed programs in secondary districts. Thirty-eight selected districts are provided technical assistance to develop a model for recruitment and retention of nontraditional students in one program area. An interesting feature of this project is that technical assistance and coordination are provided by staff of several other funded projects, including the statewide training network. Thus, the efforts of several different projects are coordinated. Another project developed a systematic method for statewide technical assistance and monitoring of local compliance with Title IX, including the self-evaluation. This paper maintained a "hot-line" to facilitate Title IX grievance procedures.

Through use of the consortium, various advocacy groups, and special projects, this sex equity coordinator has succeeded in extending her efforts far beyond what could have been accomplished through the $50,000 set-aside alone. Moreover, by using these resources to fulfill many of the cluster 1 functions, she has had more time to devote to the planning and monitoring activities in cluster 2. In particular, she has succeeded in securing project funds to provide detailed analyses and dissemination of the following: enrollment data by program within individual local districts (function b); results of various statewide sex equity surveys on program and service offerings in local districts (function e); status of employees by sex (function f).

The other large state provides a useful contrast in many respects. Here, the coordinator enjoyed not only the support of the state director, but

a position of authority within the state agency. In addition to hiring more sex equity personnel (three professional staff and two clerical staff), this coordinator also enlisted support from other agency staff, as well. A permanent internal task force on sex equity composed of representatives from the program instruction bureaus has formal responsibilities to assist her in providing technical assistance to local instructional staff, including awareness activities (function a) and the development of action plans (function c). These personnel also assist the coordinator in program review activities (function e), as well as developing recommendations for the annual plan (function j). A distinctive feature of this coordinator's strategy is that state agency vocational education bureaus are required to submit annual plans and status reports documenting what positive actions they undertake to eliminate sex bias and sex stereotyping within their program specialties. Thus, state program instructional bureaus are accountable to the sex equity coordinator for taking positive actions to promote sex equity.

This coordinator is also responsible for reviewing the distribution of funds to displaced homemakers and other special groups. To ensure a more comprehensive approach to addressing their needs, she developed a consortium of bureaus within the state agency. She also coordinates efforts of the Education Department and the Department of Labor to provide total services to participants in funded programs.

The most comprehensive of the several federally funded staff development projects in this state consists of a six-credit graduate course taught over two semesters to train teams of vocational instructors, counselors, and administrators to become change agents in their own districts. The project director and her staff are located in one of the four-year state postsecondary institutions. By Spring 1980, the course had been given in 11 locations throughout the state to a total of 395 vocational educators, 45 percent of whom were male.

This multifaceted project has produced and disseminated widely a variety of teaching aids on sex equity in vocational education for use by educators, students, and community groups. Furthermore, this project has taken steps to encourage the inclusion of sex equity into the regular undergraduate curriculum of all teacher educators throughout the state. Moreover, other states in our sample report using their programs and materials

This sex equity coordinator is one of those who has been able to implement a statewide system to require local districts to produce formal action plans. (See the section, "Cluster 1: Proactive Efforts," for a discussion of the extent of implementation, as well as an exemplary action plan developed by an area vocational school.)

In part because this coordinator has been able to delegate the delivery of some cluster 1 activities to other agency staff or VEA-funded projects, she has been able to direct more of her energies to overall planning and monitoring functions. For example, she assumes an active role in reviewing the distribution of grants and contracts, including the development of a review instrument (a priority scoring plan for sex equity), staff training, assistance to supervisory staff, as well as sign-off authority. She also conducts compliance reviews of a sample of funded programs and makes recommendations for follow-up action.

Another area where this coordinator has been particularly active is in monitoring employer practices (function f). As mentioned previously, this has been one of the most difficult functions for coordinators to implement.

These two states are illustrations only. In general, we found a great deal of activity being conducted at the state level. In order to further enhance sex equity goals in vocational education, however, we would recommend the following refinements.

Policy Implications

First of all, we recommend that the federal set-aside to support the full-time personnel be retained. Consideration should be given to increasing the set-aside amount to adjust for the effects of inflation. By and large, the provisions governing sex equity are clear and consistent. We recommend retaining those governing full-time sex equity personnel and their prescribed functions. The statute and/or regulations governing function f--monitoring laws prohibiting sex discrimination in employer practices--needs clarification, however. States are not certain as to whether this prescribed function refers to statewide practices or those affecting the state vocational agency only. Also, the statute and/or regulations need to make explicit the relationship between the responsibilities of the sex equity coordinator and the administration of the OCR Guidelines. This matter was not addressed in the current legislation.

Consideration should be given to supplementing the language of the legislation to include the notion of "expanding sex role expectations" or "expanding career options."

With respect to the use of discretionary funds, we feel that the distinction must be clarified between the target populations served by displaced homemaker programs and other support services for women entering nontraditional programs funded under Subpart 2. Clearly, displaced homemaker programs should provide opportunities for those "displaced homemakers and other special groups" seeking nontraditional employment opportunities. At the same time, other target groups--e.g., secondary and postsecondary men and women--may also need support services upon entry into nontraditional programs. Therefore, we recommend the following:

- Include support services for those seeking to enter nontraditional employment as a component of any displaced homemaker program. Delimit the target population to displaced homemakers and other special groups, including current homemakers and part-time workers who wish to secure a full-time job.
- Change the provisions governing both displaced homemaker programs and support services for nontraditional training to read, "The State shall fund programs . . . to assess and meet the needs" of these groups.
- Change the wording of the support services provision to read, ". . . for women and men who enter programs to prepare individuals for employment in jobs which have been traditionally limited to members of the opposite sex.

As for use of funds under Subpart 3, we recommend that consideration be given to strengthening the language in regard to establishing incentives for developing programs at the local level to eliminate sex bias and sex stereotyping

In regard to the national advisory council (NACVE), we encourage the continuation of their efforts to provide leadership in the area of sex equity. Consideration should be given to strengthening the language of the statute and /or the regulations concerning the "appropriate representation" of women on the state advisory councils (SACVEs). Also, consideration should be given to strengthening the language concerning SACVE responsibility to conduct evaluation of programs for sex equity.

Finally, we encourage further efforts by OVAE to provide leadership and technical assistance in the area of sex equity. There should be a team of full-time OVAE-based program specialists who can provide continuity of service to the states. They should assist the states to develop:

- operational definitions for each of the mandated functions, particularly focusing on those identified as most troublesome
- measures of success and accountability
- design of a delivery system to augment the coordinator's role
- exemplary state-level practices, including support and review of local action plans and other activities currently in need of more widespread implementation
- exemplary local approaches to sex equity

In addition to current plans for written dissemination materials, desk audits by the federal program specialist and MERC/Q reviews, we suggest the following federally funded activities:

- Support of "successful" coordinators in order to document their activities and to provide technical assistance on a regional or national basis
- Continued support of the national network of sex equity coordinators, as well as increased support of regional efforts at communication
- Resource exchange, whereby new methods, materials, and exemplary local programs can be disseminated informally as they are developed

With the above changes, we think the provisions to promote sex equity in vocational education programs will be more effective.

CHAPTER 6

SPECIAL NEEDS POPULATIONS

6.1 INTRODUCTION

The 1976 Education Amendments continue the emphasis begun in 1963 on serving special needs students in vocational education. The Vocational Education Act of 1963 included for the first time the mandate that vocational education respond to the special needs of students who have academic, socio-economic or other handicaps which prevent them from succeeding in a regular program of vocational education. The original mandate for special needs populations was very broad. The provisions in 1963 focused on equality of access to vocational programs; the Act allowed states to use a portion of their basic grants to serve these disadvantaged students but did not require them to target funds. In 1968, Congress determined that this broad emphasis had not resulted in services that met the needs of disadvantaged populations. Testimony before the Congressional committees from the National Advisory Council on Vocational Education and various sections of the educational community pointed out that simply emphasizing services to special needs students did not ensure that money was being spent to remedy these concerns. Congress amended the 1963 Act to specify that 15 percent of the basic state grant must be set aside to pay for up to half the cost of programs for disadvantaged students and 10 percent for the handicapped. The 1968 Amendments also authorized a new 100 percent-funded federal program for the disadvantaged under Section 102(b).

Despite the added specificity of the 1968 Amendments, criticisms of vocational education's response to the needs of handicapped and disadvantaged students continued. The major criticism voiced in the Congressional hearings which preceded the drafting of the 1976 Education Amendments was that vocational education expenditures for these special needs populations had declined since FY 1970. The basis for this criticism was an analysis of handicapped and disadvantaged expenditures in the 1974 GAO report* which showed a decrease

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*Comptroller General of the United States, Report to the Congress, "What is the Role of Federal Assistance for Vocational Education?" (Washington, D.C.: December 31, 1974).

in the state and local match for federal set-aside dollars; in FY 1973, 23 states spent fewer state and local dollars for every federal dollar for the disadvantaged than they had in FY 1970; for the handicapped, this happened in 19 states (p. 4). The GAO report also criticized vocational education more generally for the inadequacy of the resources devoted to special populations, making broad reference to large unmet needs, relatively few handicapped participants and inadequate dollars, personnel and facilities (pp. 22-23). These criticisms, combined with pressures and mandates for service contained in the Education for All Handicapped Children Act, Section 504 of the Handicapped Persons Act, provisions in the 1974 bilingual education legislation and increasing concern by the Office of Civil Rights, served as a catalyst in amending vocational education legislation in 1976.

The 1976 Education Amendments continue the emphasis on special needs populations by increasing the set-aside provision for the disadvantaged to 20 percent of the state's basic appropriation for Subparts 2 and 3 and by maintaining the 10 percent set-aside for the handicapped. The 1976 Amendments also require for the first time that states spend a certain portion of the disadvantaged set-aside on students with limited proficiency in English; the portion is to be equivalent to the proportion of limited English-proficient persons age 15-24 in relation to the entire population of the state in the same age bracket.

In addition, in response to the concern with declining state and local expenditures for these populations, the 1976 Amendments added a provision for categorical matching for the set-asides in order "to assure that Congressional intent in giving special status to these areas is upheld" (Senate report, p. 78). Thus, every dollar of federal set-aside funds spent must be matched with a dollar of state and local funds which are spent on services for handicapped and disadvantaged students in vocational education.

The regulations which were issued to implement the 1976 Amendments further emphasize the federal desire to increase state and local efforts for the handicapped and disadvantaged students and ensure that federal dollars were supplementing rather than supplanting state and local dollars by specifying that federal set-aside funds can only be applied to ward the excess costs of providing additional services; i.e., "costs of special educational and related services above the costs for non-handicapped [and non-disadvantaged] students" (Regulation 104.303). Interestingly, the excess cost provisions

apply only when handicapped and disadvantaged students are enrolled in regular programs of vocational education. Despite language in both the law and the regulations which encourages mainstreaming (Section 110(a); Regulations 104.312 and 104.313), separate specialized programs for handicapped and disadvantaged students can use federal funds to pay half the costs of the full program rather than just the excess costs.*

The 1976 Amendments also maintain a separate allocation for special programs for the disadvantaged (Subpart 4 of Part A). These funds are to be used within each state in "areas of high concentrations of youth unemployment and school dropouts" (Section 140). These funds, unlike set-asides, can be used to pay the full cost of vocational programs for the disadvantaged.**

Other provisions for the handicapped and disadvantaged, including the limited English speaking, in the 1976 Amendments reinforce the emphasis on special needs populations and clarify Congressional intent in serving them. In keeping with the emphasis on rational planning discussed in previous chapters, the Amendments require that state plans and state board evaluations address the needs of special populations and the success in serving them. The state plans are to also describe the mechanisms used to coordinate vocational education programs with CETA programs.*** The Amendments also require that the vocational education provided to handicapped students is coordinated with the plans and services provided under P.L. 94-142 (the All Handicapped Children's Act) and that all special need students be served, wherever possible, in regular programs of vocational education. Finally, the regulations which implement the law operationally define handicapped, disadvantaged and limited English-proficient students.

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*Office of Education Notice of Interpretation, Federal Register, March 27, 1978.

**The regulations alter this phrasing slightly and refer to 100 percent of the costs of special programs for disadvantaged persons (Regulation 104.802).

***Since these provisions have been discussed in other chapters as part of the discussions of planning documents, evaluation and coordination with CETA, they will not be examined in this chapter.

In this chapter, we will examine the ways in which these provisions (with the exceptions noted above) are being carried out in our 15 sample states. The focus of the chapter is on the use of VEA funds and on the state administration of programs for special populations. The chapter is by no means a comprehensive view of all additional services being provided to special needs populations in vocational education or of the vocational programs in which those students are enrolled: given the limited amount of time we spent in local institutions, we can present only anecdotal information about the actual delivery of services to special needs populations.* The chapter is organized in four sections: the distribution and expenditure of the set-asides and funds for special disadvantaged programs; the delivery of services to special needs populations; state activities for these populations; and conclusions.

6.2 DISTRIBUTION AND EXPENDITURES OF SET-ASIDES AND FUNDS FOR SPECIAL DISADVANTAGED PROGRAMS

Clearly, the primary mechanism for giving priority to special needs populations in the 1976 Amendments is the targeting of funds through the handicapped and disadvantaged set-asides from Subparts 2 and 3 and the special programs for the disadvantaged under Subpart 4. The size of the set-asides and Subpart 4 allocations in the 15 sample states varies considerably, as might be expected given the range in the size of the states in the samples and the differences in their total VEA allocations. Table 6.1 shows that the set-asides for FY 1978 range from $204,436 to $4,495,564 for the handicapped and from $408,872 to $8,991,128 for the disadvantaged. Subpart 4 allocations, which are always considerably smaller, range from $79,013 to $1,737,498.

In conducting our investigation of the implementation of the 1976 Amendments, we found that the spending of the set-asides and Subpart 4 funds is still a key issue, though state and local vocational education administrators voiced somewhat different concerns than Congress. Whereas Congress

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*Fortunately, a companion NIE study conducted by A.L. Nellum is devoted entirely to special needs populations in vocational education and should be very useful in identifying local strategies and activities for serving special populations. The Nellum study also examines racial and ethnic minorities, including Native Americans, in vocational education. These groups are not given separate treatment in this chapter because of the need to limit our scope of study.

Table 6.1

SET-ASIDE AND SUBPART 4 ALLOTMENTS FOR FY 1978

	Handicapped Set-Aside	Disadvantaged Set-Aside	Subpart 4: Special Disadvantaged
Alabama	$1,037,733	$2,075,466	$ 401,075
California	4,495,564	8,991,128	1,737,498
Colorado	632,590	1,265,180	244,491
Florida	1,838,912	3,677,825	710,724
Illinois	2,249,978	4,499,957	869,598
Indiana	1,309,418	2,618,837	506,079
Kentucky	950,580	1,901,159	367,391
New Hampshire	204,436	408,872	79,013
New Mexico	350,207	700,414	135,352
New York	3,588,050	7,176,101	1,386,751
Oklahoma	706,744	1,413,488	273,151
Oregon	546,082	1,092,163	211,056
Pennsylvania	2,724,363	5,448,726	1,052,943
Texas	3,141,240	6,282,479	1,214,063
Wisconsin	1,157,868	2,315,737	447,507

Source: BOAE Statistical Reports for FY 1978.

focuses on levels of spending as evidence of the adequacy of the resources that states are devoting to special needs populations, state and local administrators emphasize the difficulties entailed in spending these monies. One general complaint among vocational education administrators is that the set-asides for the handicapped and disadvantaged together with the set-aside for postsecondary and adult programs, the mandatory 80/20 split between vocational programs and program improvement and other earmarking of funds tie up such a great proportion of money to use as they see fit to meet their priorities. Beyond this, they argue that the excess cost and matching requirements are so restrictive that they serve as disincentives rather than incentives in using the set-asides. They also argue that the BOAE requirements to distribute set-aside and Subpart 4 funds according to formulae result in inappropriate allocations within the state, both in terms of spreading funding so thin that each eligible recipient receives an amount so small that it is not useful and in terms of allocating monies to districts which do not use them.

In this section, we will look more closely at several aspects of spending the set-asides and Subpart 4 funds including these concerns. We will describe the patterns of spending among eligible recipients; analyze the levels of expenditures and the size of the state and local match for these populations; examine the excess cost and matching requirements; and analyze the procedures for distributing the set-aside and Subpart 4 funds among eligible recipients.

The primary sources of data for these analyses are BOAE reports of expenditures and allocations for FY 1978 augmented by interview data from our on-site visits. Where possible, the BOAE data were used in preference to data from individual state plans and accountability reports because the state documents do not follow a consistent format, thus making it difficult to be sure that we are using comparable figures across states in all cases. We recognize that BOAE data are frequently criticized for their inaccuracies but they were the best data available to us and we assume that they have resolved at least the major points of inconsistency which appear in state documents. For the analyses presented in Section 6.2.1 (the patterns among eligible recipients), however, we did use individual state documents because the breakdowns of data needed were not included in the BOAE reports. Moreover, the analyses in Section 6.2.1 are presented for only a limited number of states in our sample

because the breakdowns we sought were presented at the states' discretion and therefore were not available in all state reports. Both the BOAE data and the data from state documents are for FY 1978, that being the most recent year for which published data are available for all states in our sample. No analyses were done on funds to limited English-speaking students because they were not consistently available.

6.2.1 Patterns of Expenditures Among Eligible Recipients

The bulk of the set-asides and Subpart 4 monies in our sample states are distributed to local public educational institutions. In some states, a portion of the set-asides is used for statewide projects. Two states in our sample, for example, fund special needs consultants or itinerant teachers to provide technical assistance to local educators in working with the special needs populations. Other states fund research and dissemination projects through universities. Many states also use the set-asides to fund programs in special schools. Eleven of the 15 sample states, for example, have used a portion of their handicapped set-aside to fund various state and private institutions to provide vocational services for blind, deaf, retarded and otherwise severely handicapped students; in two states a majority of the funds go to support these programs. Nine of our sample states use a portion of their disadvantaged set-aside to provide grants for vocational advocates in correctional institutions and sheltered environments. One sample state uses its Subpart 4 funds for vocational training in correctional institutions.

The major portions of the set-asides and Subpart 4 monies in most states, however, are distributed to local education agencies. Within this broad category, the pattern of expenditures varies across sample states as shown in Tables 6.2, 6.3, and 6.4.

Table 6.2 shows the proportion of each state's set-aside and Subpart 4 funds which are expended by secondary and postsecondary institutions. As the data indicate, states tend to use their set-asides predominantly at one level of education. In four of the six states for which data were available for this analysis, more than 85 percent of the handicapped set-aside monies were spent at one level; in three of the six states, more than 75 percent of the disadvantaged set-aside monies were spent at one level. Across states, there is no consistent pattern of secondary predominating over postsecondary or

Table 6.2

PERCENT OF HANDICAPPED AND DISADVANTAGED FUNDS BY LEVEL OF EDUCATION FROM VEA FUNDS - SET-ASIDES AND SUBPART 4[a]

	Handicapped Set-Aside		Disadvantaged Set-Aside		Subpart 4: Special Disadvantaged	
	Secondary	Postsecondary	Secondary	Postsecondary	Secondary	Postsecondary
Alabama			100	0	100	0
California					50	50
Colorado					69	31
Florida	87	13	64	36	40	60
Indiana					100	0
Kentucky					21	79
New Hampshire	100	0	100	0	52	48
New Mexico	0	100	0	100	0	100
Oregon	43	57	38	62	58	42
Pennsylvania	64	36	68	32	100	0
Wisconsin	10	90	21	79	49	51

[a]Empty cells indicate that data were not available for that breakdown; sample states with data for none of these breakdowns are not included.

Source: 1978 Accountability Reports.

vice versa: In our small sample, an equal number of states spend the major portion of their set-asides in secondary as they do in postsecondary institutions. Our site visits suggest two reasons for these spending patterns. One is that the funds are targeted to reflect the state vocational education agency's primary orientation to one level of education over another. A second reason for targeting is administrative ease: excess costs and matching requirements may more easily be accommodated within the delivery and accounting systems of one level rather than another in some states. For example, one state in our sample, while generally giving emphasis to secondary vocational education, prefers to use its set-asides in post-secondary institutions because their accounting systems can create an audit trail for documenting excess costs more easily than in secondary institutions.

Table 6.2 also shows that the pattern of expenditures for Subpart 4 monies is somewhat different than the pattern for the set-asides. Targeting funds predominantly to one level is less pronounced: In 5 of the 11 states for which data were available, Subpart 4 monies were distributed approximately evenly between secondary and postsecondary institutions.

Table 6.3 shows the extent to which state agencies target the set-aside and Subpart 4 monies to a limited number of eligible recipients across and within levels of education. Not surprisingly, Subpart 4 funds go to a relatively small number of institutions in most states.* Given the targeting requirements in the law which specify that these funds must go to areas of high concentrations of unemployment and school dropouts, and given the small allocations in this subpart, we would not expect the funds to be distributed broadly to a large number of eligible recipients.

There is less targeting to a few eligible recipients in the expenditure of the set-asides, particularly if secondary and postsecondary distributions are examined separately. As Table 6.3 shows, set-aside funds are used by more than 70 percent of the eligible recipients at at least one level of education in four of the seven states for which data for the handicapped are available and in five of the seven states for which data for the disadvantaged

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*The base of eligible recipients against which the Subpart 4 proportions shown here are calculated is the total number of recipients eligible for VEA dollars, not the more limited group of agencies eligible for Subpart 4 monies.

Table 6.3

PERCENT OF LOCAL ELIGIBLE RECIPIENTS RECEIVING FUNDING FOR THE HANDICAPPED AND DISADVANTAGED FROM VEA FUNDS - SET-ASIDES AND SUBPART 4*

	Handicapped Set-Aside			Disadvantaged Set-Aside			Subpart 4: Special Disadvantaged			OEE Funded
	Secondary	Adult and Postsecondary	Total	Secondary	Adult and Postsecondary	Total	Secondary	Adult and Postsecondary	Total	
California	78	100	81	59	100	65	20	41	23	
Colorado							4	13	6	Yes
Florida	49	25	39	73	68	66	22	21	21	Yes
Illinois							7	23	9	Yes
Indiana			20			26			4	Yes
Kentucky									6	Yes
New Hampshire	74	0	60	81	14	63	7	0	6	Yes
New Mexico	0	25		0	25		7	13		Yes
New York							3	0	2	
Oklahoma										
Oregon	18	85	22	20	92	25				
Pennsylvania	12	11	12	22	32	22	3		3	Yes
Texas							<1	9	01	Yes
Wisconsin		100			100			100		Yes

*Empty cells indicate that data were not available for that breakdown; sample states with data for [illegible] of these breakdowns are not included.

Source: 1978 Accountability Reports.

are available. In most of these states, the set-asides are used at the nonpreferred level in a relatively small proportion of eligible recipients. Again, this finding is not surprising. Less targeting is to be expected since the allocations for the set-asides are larger than the Subpart 4 allocations. Moreover, with the matching and excess cost requirements, more projects have to be funded to use the same amount of federal money under the set-asides. Distributing the funds among a large number of institutions is a logical approach to funding more projects. It is also consistent with the Congressional intent of using federal funds as seed money which would have broad impact.

Table 6.4 shows the mean federal allocation to each institution receiving set-aside or Subpart 4 funding and the average per-pupil allocations for these funds in each institution.* The pattern of higher average grants and average per-pupil expenditures for Subpart 4 than for the set-asides is consistent with the greater targeting of funds under Subpart 4 to fewer eligible recipients described above, and is to be expected given that the Subpart 4 monies can be used to fund 100 percent of the program costs.

Perhaps the most striking feature of the data in Table 4 is not trends or comparisons among categories of funding, but the large variation among states in the average per-pupil allocations within categories. Expenditures under the handicapped set-aside, for example, range from $99 to $612 per pupil. Such substantial variation in expenditures suggests that the earmarked funds for special needs populations are being used to support widely differing levels and/or types of services.

In sum, it appears that of the three categories of funding, states tend to use the Subpart 4 monies the most selectively. As might be expected, the monies are targeted to a smaller proportion of eligible recipients and are funded at a higher per-pupil allocation than the set-asides, although they are more evenly distributed between secondary and postsecondary institutions than the set-asides. In contrast, the disadvantaged set-aside is used most widely of the three categories. Although funding tends to be targeted predominantly to one level of education in many states, this targeting is somewhat less pronounced than in the handicapped set-aside, and the average per-pupil allocations are consistently lower than the handicapped per-pupil allocations.

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*Only federal dollars are shown; no state and local dollars are included in Table 6.4.

Table 6.4

MEAN PROJECT ALLOCATION TO LOCAL INSTITUTIONS AND PER-PUPIL COST FROM VEA FUNDS: SET-ASIDES AND SUBPART 4*

	Handicapped Set-Aside		Disadvantaged Set-Aside		Subpart 4: Special Disadvantaged	
	Mean Allocation	Mean Per-pupil Cost	Mean Allocation	Mean Per-pupil Cost	Mean Allocation	Mean Per-pupil Cost
California	11,519	191	28,409	49	29,065	173
Colorado					29,978	797
Florida	30,293	112	34,088	52		
Illinois					15,811	365
Indiana	10,770	260	21,782	132	36,782	282
Kentucky					9,450	145
New Hampshire	6,586	99	7,938	65	9,237	204
New Mexico	33,136	612	104,710	120	36,625	506
New York	239,586		589,272	52	408,242	191
Oregon	10,024	199	19,450	67		
Texas					33,013	50

*Empty cells indicate that data were not available for that breakdown; sample states with data for none of these breakdowns are not included.

Source: 1978 Accountability Reports.

These patterns may reflect the fact that the eligibility rquirements for disadvantaged students are broader than those for the handicapped, and that disadvantaged students may need fewer additional services to allow them to succeed in vocational education than handicapped students.

6.2.2 Levels of Expenditure and Size of State and Local Match

Congress, as we indicated earlier, was concerned about what it judged to be an inadequate level of spending for special needs populations in vocational education prior to the 1976 Education Amendments. The basis for this judgment was the 1974 GAO report which found that the federal handicapped and disadvantaged funds were being matched with state and local dollars at a much lower rate than vocational education funds overall. For FY 1973, the GAO report states:

> . . . [T]he nationwide ratio of state and local funding to Federal funding for all part B programs . . . was $5.93 to $1.00. Yet the ratio for programs serving the disadvantaged was only $2.19 to $1.00 and for the handicapped only $1.10 to $1.00. (p. 4)

From these figures, GAO concluded that "persons with special needs have not been given as high a priority with state and local support as with Federal support" (p. 4). Moreover, the GAO report found that in many states, the state and local contribution declined between FY 1970 and FY 1973.

An analysis of state and local match for federal VEA funding for FY 1978, based on BOAE statistics shows that the level of matching for handicapped and disadvantaged funds has increased since FY 1973, although the match for the set-asides is still lower than the match for all VEA funds. Table 6.5 shows the total VEA and set-aside matching ratios for our 15 sample states calculated from the BOAE statistical reports for FY 1978. Nationwide, the ratio of state and local funds to federal VEA funds is $12.27 to $1.00, while the state/local to federal ratio for the disadvantaged set-aside is $5.34 to $1.00, and for the handicapped set-aside is $4.07 to $1.00. Since we do not know how GAO calculated the ratios it reported, we cannot assume that our ratios are directly comparable to theirs and therefore do not want to dwell on the size of the increase. The patterns seem strong enough, however, to

Table 6.5

RATIOS OF STATE AND LOCAL TO FEDERAL FUNDING: FY 1978 EXPENDITURES

	Total VEA	Handicapped Set-Aside	Disadvantaged Set-Aside
Alabama	6.08	1.14	2.08
California	16.81	17.57	17.66
Colorado	11.60	6.64	0.38
Florida	20.80	3.58	12.65
Illinois	15.48	5.64	6.80
Indiana	3.22	1.73	1.62
Kentucky	6.78	1.01	1.05
New Hampshire	10.05	2.20	1.56
New Mexico	13.13	3.00	14.84
New York	15.84	2.96	10.30
Oklahoma	11.49	1.39	1.33
Oregon	2.49	1.91	.40
Pennsylvania	14.58	1.14	1.56
Texas	26.66	12.40	33.31
Wisconsin	30.58	5.00	11.32

Source: BOAE Statistical Reports for FY 1978.

Note: The numbers in each column are the reported state and local dollars expended divided by the reported federal funds expended. The number shown, then, is the amount of state and local spending for every $1.00 of federal spending. The data include only FY 1978 funds expended; no carryover funds are included.

support the broad conclusion of an increase in state and local efforts to serve special needs populations.*

Another major Congressional concern is that handicapped and disadvantaged funds will be returned to the federal Treasury unspent. Table 6.6 shows that in FY 1978, none of our sample states in fact spent all of its set-asides and subpart 4 money during that fiscal year. However, given that states legally can, and routinely do, spend one year's federal allocation over a period of several years, this finding alone does not indicate that Congressional fears of unspent funds have been realized. That question cannot be finally resolved until all expenditures are reported several years hence. One intermediate indication, though, of special problems in spending the set-asides can be drawn from the proportion of the handicapped and disadvantaged funds spent in relation to the total proportion of the VEA grant spent: one could argue that the carryovers in the set-asides are an indication of low priority only if they are appreciably larger than the carryover for all VEA monies. Table 6.6 shows that in 6 of the 15 states for the disadvantaged set-aside and in 9 of the 15 states for the handicapped set-aside, the carryover for the set-asides was no greater than the carryover for the VEA grant overall, suggesting that in these states the proportion of funds not spent reflects general administrative practices rather than problems unique to serving handicapped and disadvantaged students. In the remaining states, however, the carryover for the set-asides was larger than that for the total VEA grant, indicating that there may be special problems in spending these funds in these states.

Surprisingly, the proportion of Subpart 4 funds expended exceeds the proportion of the total VEA funds spent in only five states. Because Subpart 4 does not require a state and local match, one might expect that it would be easier to spend than the set-asides--or the total VEA grant--and consequently would consistently show a higher proportion of the allocation spent.

Thus, it appears that by FY 1978, states had increased their efforts in serving handicapped and disadvantaged students in vocational education. The

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*Recent testimony by the National Center for Educational Statistics (NCES) before the House Elementary, Secondary and Vocational Education Subcommittee (September 17, 1980) reports a substantial decrease in handicapped and disadvantaged expenditures between FY 1978 and FY 1979. Since the FY 1979 data were not available at the time of our analysis, we cannot support or refute the NCES conclusions.

Table 6.6

ANALYSIS OF SPENDING FOR SAMPLE STATES - PERCENTAGE OF FY 1978 FUNDS EXPENDED BY SECTION FOR SAMPLE STATES

	Percentage of Total Allocation Spent in FY 1978	Percentage of Total Set-aside Funds Spent		Percentage of Total Subpart 4 Funds Spent
		Disadvantaged	Handicapped	
Alabama	74	91	88	91
California	55	58	61	50
Colorado	85	74	49	55
Florida	37	32	53	18
Illinois	90	90	91	88
Indiana	50	47	58	0
Kentucky	73	63	63	100
New Hampshire	48	31	39	58
New Mexico	40	47	87	2
New York	81	70	80	80
Oklahoma	77	94	86	100
Oregon	53	44	39	26
Pennsylvania	55	39	59	64
Texas	26	7	8	20
Wisconsin	28	30	37	22

Source: Calculated from BOAE Statistical Reports for FY 1978.

state and local contribution to handicapped and disadvantaged populations increased between FY 1973 and FY 1978. The state and local match for the set-asides is substantially lower than the overall VEA match in all states. However, the level of the set-aside match is not necessarily an indicator of low priority to special populations; it may instead reflect states' decisions to "stop counting" after they have reached the required level of matching because the accounting is so complicated. Moreover, in a large proportion of states, the rate of spending for the set-asides is no lower than for the total VEA allocation. This is not to say that states are not having difficulty in spending the set-asides, as we will see in the next section, or that carryovers are not a larger problem with the set-asides than the total grant in some states. It does suggest, however, that a number of states have been able to spend their set-asides.

6.2.3 Excess Cost and Matching

While Congress was concerned with levels of spending as indications of the low priority given to special needs populations, the state and local administrators in our study talked at length about the difficulties they were having in spending the set-asides. The major barriers to spending, from their perspective, are the excess cost and matching requirements that were included in the 1976 Amendments and OE regulations as a mechanism for increasing state and local spending for special needs populations. The excess cost and matching issues, together with problems associated with the general distribution formula, were probably the most frequently raised concerns about the 1976 Amendments among the majority of state and local officials we interviewed.

The 1976 Amendments require that the federal dollars expended under the handicapped and disadvantaged set-asides be matched dollar-for-dollar with state and local dollars. One key element of this requirement is that the match for the set-asides is to be separate from the overall match the state provides for VEA funding; in other words, federal dollars for handicapped and disadvantaged must be matched with state and local funds which are used to provide services to these same populations. According to the House report,

> [T]his provision results from concerns expressed in the recent GAO report that states are supplanting state and local funds with Federal funds for these purposes. That clearly was not what we contemplated when we included these provisions in 1968. (p. 46)

The other key element of the matching provision is that when handicapped and disadvantaged students are mainstreamed, the match must be applied only to excess costs; i.e., the costs of additional services to special needs students above the cost of the regular vocational program. In a mainstreamed program, the handicapped or disadvantaged student is placed in a regular vocational program with non-handicapped or non-disadvantaged students; extra support is provided to the handicapped or disadvantaged students or to the instructors. In this situation, the state and local funds used for the basic program cannot be used as a match for the set-asides. As explained in Office of Education's Notice of Interpretation:

> If the cost of providing vocational training in electronics to the non-handicapped or non-disadvantaged student is $600, and the cost of providing supportive services in vocational training in electronics to the handicapped or disadvantaged is $150, the state may use the combined Federal funds and state and local funds to pay only the incremental cost of $150.. . ." (Federal Register, March 27, 1978)

Thus, in terms of the total cost of serving handicapped and disadvantaged students with supplementary or supportive services in a regular program of vocational education, federal set-aside funds provide $75, while state and local funds provide $675.* In practice, the matching requirement applies to the statewide aggregate of excess costs and is not necessarily to be applied on a program-by-program basis.

In contrast to this policy, if handicapped or disadvanted students are served in wholly separate programs, the state and local match--and the federal contribution--can be applied to the full cost of the program. Again referring to the Office of Education's Notice of Interpretation:

> In some instances, the handicapped or disadvantaged student must be placed in a separate specialized program because [of] the nature or severity of the handicap or disadvantage . . . In a separate specialized program, the class is used exclusively by handicapped or disadvantaged students . . ..[T]o the extent a separate specialized vocational education program is warranted, the entire separate specialized program may be funded in full from the Federal and matching State and local funds under section 110 (a) and (b). However, the average statewide (State and local) expenditure,

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*Except that a portion of the $600 "base" could be supported with regular VEA funds.

per student, for handicapped persons must equal or exceed the average per student expenditure for non-handicapped persons.

Given this second policy, we might expect administrators to ameliorate their difficulties with excess cost requirements by serving most handicapped or disadvantaged students in separate programs. In our interviews with state and local administrators, no one told us they had adopted this strategy--we could not determine whether they actually did not use this strategy or whether they just did not mention it because it runs counter to the policy encouraging mainstreaming. (We will discuss this issue further in the section on mainstreaming below.) In either case, the creation of separate programs does not appear to be a widespread solution to the policy of excess costs because the majority of administrators raised them as a major problem.

Many of the state and local administrators in our sample argued that the matching requirements are unfair and almost impossible to meet. One state director told us that the regulations now require "at least a 50 to 1 match" on the total cost of providing vocational education for special needs vocational students. He further pointed out that vocational education is already considered by many local boards to be too costly. With the recent proliferation of state and local tax-cutting incentives, school boards are not receptive to proposals for additional spending.

Another state director indicated that the matching provisions keep the states from giving the funds to those districts "most in need of additional support." These are local districts which were unable or unwilling to provide the required match and the state was unable to find additional funds to assist with the match. In another state, we heard that $100,000 of the set-aside was returned at the end of FY 1978 because local agencies were unable to generate the required match. In these latter examples, the state agencies were passing the burden for generating a match to the local districts even though the 1976 Amendments explicitly state that an individual district should not be prevented from serving the special needs populations by its inability to provide the required match. The provision for a statewide rather than a program match, however, assumes that in some districts or in state programs, there is a sufficient over-match to average out at the right level. One state director estimated that if the state were to supply the matching funds for these programs, it would take an additional annual appropriation of $60 million, and that was unlikely.

Some states in our sample, however, have been successful in generating a state match without burdening the local districts. A few states have state-funded vocational programs which they use as a match. Several states give part of their set-aside allocation to special state-supported schools for the deaf, blind, or mentally retarded. These states also fund vocational programs for inmates in state prisons. Obviously, it is easy to generate a very large over-match in these types of institutions with a small amount of federal VEA funds. One state was able to generate almost all of its required state and local match by allocating funds for a state-supported inmate training program.

In 1979, Congress responded to the states' concerns regarding the stringent matching requirements with the passage of Technical Amendments. As explained in the House report accompanying the Technical Amendments, Congress recognized that the requirements were serving as a disincentive to providing federal dollars to support vocational education to special populations and were imposing a financial hardship on local eligible recipients (p. 10). To remedy this problem, the Amendments allow states to exceed on a statewide basis the 50 percent match to the federal share for programs and services for the handicapped and disadvantaged, "pursuant to regulations issued by the Commissioner" (p. 10). The regulations which implement these Amendments allow states to fund additional services using up to 60 percent federal funds with several restrictions. Among these restrictions, states have to apply to the Commissioner each time they want to utilize this waiver; the application must be filed in the fiscal year preceding the year in which the state wants to use a greater federal share; and the portion of the federal share exceeding 50 percent must be taken from the regular Subpart 2 and 3 funding, not from the set-asides. We do not know how the Amendments have helped the states because our study was conducted too soon after their passage and the issuance of regulations to assess their impact. In our judgment, however, the procedures for applying for a waiver seem to place such a burden on the states that we wonder if any states will--or already have--felt it worthwhile to seek to take advantage of the more flexible law. Clearly this is an issue that Congress will want to continue to monitor.

The second major problem cited by state and local administrators in explaining their difficulties in spending the set-asides had to do with the definition of excess costs and the problems of creating an adequate audit

trail for them: State and local agencies have been cautious in their interpretation of the excess cost regulation because they fear that their claims for federal reimbursement will be disallowed; as a result, some local agencies apparently do not claim reimbursement for expenses that presumably qualify.

In part, the difficulties stem from a poor understanding of the definition of additional services and excess costs. In one state, we were told that "three different federal officials gave us three different" explanations of excess cost. Most often, however, we heard that lack of the operational examples of allowable excess costs expenditures (particularly for the disadvantaged population) had inhibited many local agencies who preferred to give the money back to the state rather than take a chance on being accused of misspending the funds, as had happened in one or two states. Few local education agencies, according to state staffs, seem willing to run the risk of having to pay back monies from regular revenues. Thus, in the absence of clear definitions and approved procedures, many local agencies prefer not to use the handicapped and disadvantaged set-asides. Other agencies do use the money but limit themselves to safe, and therefore often uncreative, uses of the funds which may not best serve the students to whom they are directed.

To some extent at least, these definitional difficulties may be a function of lack of experience in working with this concept and, therefore, should diminish as time goes on, particularly if BOAE and the state agencies provide technical assistance. At least one state we visited is holding workshops and issuing guidelines on these topics with the explicit goal of encouraging and enabling local education agencies to increase their use of set-aside funds.

The difficulties associated with the excess costs requirements also stem from the accounting systems required to document them. This problem may be harder to solve than the definitional problem. Several respondents indicated that it is extremely difficult to track expenditures for additional services. The problem is particularly difficult when the special needs students are mainstreamed and expenditures must be tracked for each student individually. The difficulty, according to our respondents, is not that tracking cannot be done, but that it is not cost effective to claim a federal reimbursement when new accounting procedures must be developed in order provide evidence to substantiate the expenditure. The director of vocational

education in a large city told us that his system serves several thousand handicapped and disadvantaged students in the city's five high schools and one vocational center each year. However, they had not claimed a single handicapped or disadvantaged student for VEA reimbursement purposes because the computer was not capable of handling the required additional data elements, and a new computer was "out of the question."

The response of turning back or not claiming set-aside funds is particularly attractive when other sources of federal or state funds are available to serve the same students with fewer strings attached or at a higher rate of reimbursement. For example, a number of local administrators stated that they would rather obtain federal assistance to serve disadvantaged students under CETA than under the Vocational Education Act because they received considerably more money.

Thus, the majority of state and federal administrators in our sample feel that the excess cost and matching requirements create substantial problems in spending the set-asides. Some sample states surmount these problems, at least to the extent that they spend the set-asides, while others do not. It is not possible to determine from our study the extent to which some of the difficulties cited by the administrators--i.e., that the match is not available and excess costs cannot be documented without incurring a tremendous burden in record-keeping--are inherent to the requirements and therefore lasting, as opposed to being functions of lack of experience in dealing with these concepts and therefore to be expected to diminish over time. In either case, the provisions in the short run are creating a disincentive to spending federal funds. In some states there may be a trade-off between using federal funds and promoting the use of state and local funds for special needs populations. One state consultant for special programs told us that he doubts "that we've gotten any more state and local money into handicapped and disadvantaged programs than we would have without the excess cost/matching provision. We would definitely have gotten more federal dollars into them [without the excess cost/matching], however."

6.2.4 Distribution Procedures

Another problem mentioned by respondents in sample states was the use of a funding formula to distribute handicapped and disadvantaged funds. In the past, most states distributed set-asides through a project method; i.e.,

local institutions developed proposals for special projects or services they wanted to undertake and requested funds to support the proposals; state agency staff decided which proposals to fund and at what level, often on the basis of past funding levels for that institution and/or professional judgments about the quality of the proposal.

Although some states continue to use a project method of funding, POAE policy encourages the formula method, and some states in our sample believe they are required to use it. Table 7 shows the number of states in our sample which used the formula method, the project method, or a combination of the two to distribute their set-asides and their Subpart 4 funds as reported in their five-year plans.

State administrators cited various reasons for their belief that the use of a formula to distribute special population funds is inappropriate. In two states, officials pointed out that the distribution of set-asides by formula resulted in trivial allocations which were almost useless to the local agency. More frequently, state administrators told us that the formula method sent funds to agencies that would not use the funds and, as a result, the state had large amounts of unspent funds which had to be carried over to the following year. While we have no evidence to support or counter the first argument, we can address the second by comparing the method by which funds are distributed to the proportion of the grant spent on the set-asides and Subpart 4. If the formula method does in fact result in monies going to agencies that will not spend them, we would expect the proportion of the set-aside and Subpart 4 funds expended in a year to be consistently lower in states which rely entirely on formula distributions than in states which use the project method or a combination of the two methods.

Table 6.8 tests this expectation by classifying states using each distribution method according to whether the proportion of the state's spending was above or below average in FY 1978 (as shown in Table 6.6). The table shows no clear pattern of superiority of one distribution method over another. Of the eight states using the formula distribution methods to distribute the disadvantaged set-aside, five were at or above the median for percentage of total allocation spent during the year, while two of the three states using the project method were in the high range of percent of allocation spent. Of the four states distributing funds with some combination of the two procedures,

Table 6.7

METHODS OF DISTRIBUTING SET-ASIDES AND SUBPART 4 FUNDS

	Formula	Project	Combination of Formula and Projects
	Number of Sample States	Number of Sample States	Number of Sample States
Set-asides	8	3	4
Subpart 4	5	7	3

Source: Five-Year Plan for Vocational Education.

Table 6.8

METHODS OF FUNDS DISTRIBUTION BY LEVEL OF SPENDING

	Formula	Project	Combination of Formula and Projects
	Number of Sample States	Number of Sample States	Number of Sample States
Disadvantaged Set-aside:			
Spent Above Average of Grant Allocation	5	2	2
Spent Below Average of Grant Allocation	3	1	2
Handicapped Set-aside:			
Spent Above Average of Grant Allocation	5	2	1
Spent Below Average of Grant Allocation	3	1	3
Subpart 4:			
Spent Above Average of Grant Allocation	2	3	3
Spent Below Average of Grant Allocation	3	4	0

half were found in the top range and half were in the bottom range of distribution of set-aside funds for the handicapped.

A similar analysis of the distribution of funds under Subpart 4 shows that five states distributed funds for these programs using the formula method, while seven and three used the project and combination methods, respectively. Of those states using project method, three were in the high range and four states were in the low range, while two out of five states using the formula method were in the high range.

Thus, in our limited sample, distributing handicapped and disadvantaged monies by formula rather than by a project method is not consistently associated with a lower level of spending.

6.3 SERVICE DELIVERY ISSUES

In addition to mandating the use of vocational education funds for special needs populations, the 1976 Educational Amendments contain several provisions which address the actual delivery of services to special populations including definitions of handicapped, disadvantaged, and limited English-speaking students; requirements for coordination between special education and vocational education; and provisions that special needs students be served wherever possible in programs of regular vocational education. In including these provisions, Congress expressed its concern not only about the amount of funds flowing to special needs populations but about the types and adequacy of services being provided. While a complete assessment of the types and adequacy of the special services being provided in vocational education is far beyond the scope of our study, we will look briefly at a subset of questions under this topic, including:

- How are special needs populations defined in practice; how are these students identified and their needs assessed?
- Are the efforts of different agencies responsible for serving handicapped and disadvantaged students being coordinated?
- Are students being mainstreamed or served in separate programs?

Even with this limited set of questions, we can provide only partial answers, particularly about limited English-speaking students, because our local site visits were brief and data collection limited primarily to interviews; we conducted no systematic classroom observations or examinations of enrollment and expenditure records.

6.3.1 Defining, Identifying, and Assessing Needs of Special Populations

The 1976 Amendments and the regulations which implement them define handicapped and disadvantaged very carefully. Figure 6.1 shows the definitions as they are given in the regulations. The definition of handicapped is taken directly from the definition used in the Education of the Handicapped Act as mandated in the law. The definition of disadvantage given in the law distinguishes between economic and academic disadvantage, and provides for special services to both groups. The regulations extend the Amendments, as directed by Congress, to specify operational criteria of academic and economic disadvantage. An additional criterion of both the handicapped and disadvantaged definitions is that persons cannot succeed in a regular vocational education program without special services, activities, or programs. Limited English-speaking ability is also defined in the regulations as shown in Figure 6.1, although not in the same level of operational detail.

All states in our sample have incorporated these definitions in their five-year plans and other formal policy directives.* The states--and the local education agencies within them--vary, however, in the emphases they place on different parts of the definitions and in the manner in which they put them into practice. There is also variation across target populations in the process by which students are identified and their needs assessed, with the process for handicapped students being the most systematic and the process for limited English-speaking students the least. In the remainder of this section, we will examine these issues for each population separately.

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*There are minor variations in the operational criteria for disadvantage which appear in the five-year plans. These undoubtedly result from the fact that these criteria were not contained in the law, and the regulations had not been issued when the states were preparing their plans.

Figure 6.1

DEFINITIONS OF SPECIAL NEEDS POPULATIONS

Target Group	Regulation	Definition
Disadvantaged	104.804	(a) The term disadvantaged means persons (other than handicapped persons) who: (1) Have academic or economic disadvantages; and (2) Require special services, assistance, or programs in order to enable them to succeed in vocational education programs. (b) Academic disadvantage, for the purposes of this definition of disadvantaged, means that a person: (1) Lacks reading and writing skills; (2) Lacks mathematical skills; or (3) Performs below grade level. (c) Economic disadvantage, for the purposes of this definition of disadvantaged, means: (1) Family income is at or below national poverty level; (2) Participant or parent(s) or guardian of the participant is unemployed; (3) Participant or parent of participant is recipient of public assistance; or (4) Participant is institutionalized or under state guardianship. (d) Eligibility for participation in the special program supported under [104.801 is limited to persons who (because of academic or economic disadvantage): (1) Do not have, at the time of entrance into a vocational education program, the prerequisites for success in the program; or who (2) Are enrolled in a vocational education program but require supportive services or special programs to enable them to meet the requirements for the program that are established by the state or the local educational agency.

Figure 6.1

(cont'd.)

Target Group	Regulation	Definition
Limited English-speaking	Appendix A Definitions	Limited English-speaking ability when used in reference to an individual means: (a) Individuals who were not born in the United States or whose native tongue is a language other than English, and (b) Individuals who came from environments where a language other than English is dominant, and by reasons thereof, have difficulties speaking and understanding instruction in English.
Handicapped	Appendix A Definitions (Education of Handicapped Act)	Handicapped means: (a) A person who is: (1) Mentally retarded; (2) Hard of hearing; (3) Deaf; (4) Speech impaired; (5) Visually handicapped; (6) Seriously emotionally disturbed; (7) Orthopedically impaired; or (8) Other health-impaired person, or persons with specific learning disabilities; and (b) Who, by reason of the above: (1) Requires special education and related services, and (2) Cannot succeed in the regular vocational education program without special educational assistance; or (3) Requires a modified vocational education program.

Handicapped

The Education of the Handicapped Act, as amended by the Education for All Handicapped Children Act of 1975 (commonly referred to as P.L. 94-142), has had a strong influence on the definition, identification, and assessment of needs of handicapped students at the secondary level. In most states and school districts in our sample, the P.L. 94-142 definition of handicap is used widely in practice. Moreover, in some places, the presence of an Individualized Education Plan (IEP), the procedure required for P.L. 94-142 is the sole criterion by which students in vocational education are judged to be handicapped: Without an IEP, a student who needs special assistance in order to succeed in vocational education is disadvantaged, not handicapped. In one state, according to state agency staff, some small schools do not have an IEP process and therefore do not claim VEA funds under the handicapped set-aside but only under the disadvantaged set-aside (even though some of the so-called disadvantaged students would be defined as handicapped students elsewhere). Most states also use the P.L. 94-142 process to identify handicaps, assess the students' needs, and develop an educational plan for students in vocational education. Because of the prominence of P.L. 94-142, the identification, assessment, and planning processes for handicapped students in vocational education tend to be systematic and similar at the secondary level across districts and states. The reliance on P.L. 94-142 also causes problems in some districts because it specifies no formal role for vocational educators in the IEP process. The relationship between vocational educators and special educators will be discussed further on the section on coordination below.

At the postsecondary level, the process of identifying handicapped students and assessing their needs is more variable, and in many cases, more problematic than at the secondary level because postsecondary institutions are not responsible for implementing P.L. 94-142. A few postsecondary institutions have elaborate diagnostic intake centers and programs of individualized instruction for all students. In these schools, there is no special difficulty in assessing the needs of handicapped students--or, reportedly, in providing additional services--though it sometimes requires extra effort to label them according to federal categories. More frequently, however, postsecondary administrators argue that they have difficulty in identifying and assessing the needs of handicapped students because they do not have a team of special educators and an IEP process in place. Some schools claim to serve these

students; they just do not claim reimbursement for them. In other cases, there seems to be more emphasis on physical than on mental handicaps. In several postsecondary institutions in our sample, our questions about services for handicapped students in vocational education were answered entirely in terms of Section 504 access issues.

Disadvantaged

Despite the fact that all states include both economic and academic criteria in their formal definitions of a disadvantaged student in vocational education, in practice the majority of states and localities place most emphasis on the academic. In a few cases, our respondents interpreted economic disadvantage literally rather than as a proxy for academic disadvantage. Thus, they felt that there was little that the school could do to help ameliorate the poverty status of its students in a vocational education program. One local vocational educator, for example, told us that beyond occasionally purchasing class materials for poor students, the school could not alleviate economic problems. At the state level, one administrator argued that there were no economically disadvantaged students in vocational education at the secondary level in his state because the schools charged no fees. In other cases, administrators said that economic information is privileged and therefore hard to obtain. As a result, it is not considered a good criterion for disadvantage.

When an economic definition of disadvantage was employed by vocational educators in our sample districts, it was generally based on an existing measure of poverty, such as recipients of AFDC eligibility for the federal school lunch program, or eligibility for ESEA Title I.

The operational definition of academic disadvantage in vocational education is more variable than the economic, both among and within states. In most cases, the definition includes a specific cutoff level keyed to standardized achievement tests--reading two years below grade level, for example. In other cases, disadvantage is defined broadly to include any student who is "not making the grade" in a regular vocational program. Students who are at great risk of dropping out of school are frequently defined as a separate category of academically disadvantaged students because their problems and attitudes toward school are usually more severe than students who are having more limited academic problems.

The means by which disadvantaged students are identified and their needs assessed vary along similar dimensions. In some cases, the procedure is very individualized: Disadvantaged students are identified by teachers or occasionally by service agencies outside the school and referred for remedial assistance in a particular course. With increasing frequency, however, schools are becoming more systematic in identifying academic disadvantage. In one small school district we visited, the high school administers the California Achievement Test (CAT) in reading and math each spring to identify students in need of assistance. Special services are then provided starting with the most needy students at the bottom of the list and moving up the list as long as money is available. One state widely uses the Individualized Manpower Training System (IMTS) to diagnose and remediate problems of vocational education students in basic skills areas. Another state in our sample and a few individual districts currently prepare a formal educational plan for disadvantaged students in vocational education, modeled after the IEP for special education.

Limited English-Proficiency

The definitions and identification procedures for students with limited proficiency in English are the most variable and least well-developed of the three special needs groups we studied. None of the states in our sample has a systematic statewide effort to serve the limited English-proficient as they do the handicapped and disadvantaged. In some districts, however, limited English-proficient students are served with local funds or on an individual basis with funds from the disadvantaged set-aside (without being separately labeled as LEP). A few of the states have active projects at the state level to promote vocational education for this group, but they are still in their early stages. Other states, including some with large nonEnglish-speaking populations, are doing little or nothing at the state level to encourage or assist the schools in serving this population.

Several reasons are given for this lack of attention. In part, it stems from lack of experience and information. State officals in one state told us that they do not even have data on the number of limited English-speaking people aged 15-24 in the state. A state agency staff member in another state said more generally that his agency is having a difficult time

finding and serving this group; in that state, no local education agencies had submitted applications to seek funding for LEPs. A few states are attempting to remedy their lack of information by conducting needs assessments. The lack of attention to this population also stems in a few instances from a resistance to serving it. In one state with a large non English-speaking population, respondents stated that the problem was too big to deal with both in terms of the number of people involved and because many of the people are illegal aliens. Moreover, a few individuals stated that they felt that students should learn English before going into vocational programs.

6.3.2 Coordination Among Local Service Delivery Agents

Because special needs populations are served--or are eligible to be served--by a range of programs and organizations, it is important for quality service delivery and (in keeping with goals of coordinated and unduplicated service delivery in the Vocational Education Act for these different programs and organizations to work together. Among the coordination issues most frequently mentioned by local administrators in our sample are: (1) cooperation between vocational and special educators; (2) cooperation between vocational educators and CETA prime sponsors; and (3) coordination between home high schools and area vocational centers. Since the cooperation between vocational educators and CETA prime sponsors in serving disadvantaged students is discussed in the chapter on CETA and vocational education coordination, it is not addressed here, although two points are worthy of note. First, some local respondents reported that they would rather use CETA money than VEA money to serve the disadvantaged because they are fully reimbursed by CETA and not by the VEA disadvantaged set-aside. Second, there is some concern over the fact that CETA students typically receive stipends, while disadvantaged students under VEA do not.* Coordination with Title I of the Elementary and Secondary Education Act was usually not mentioned by the vocational educators with whom we spoke, probably because the Title I target schools and students are quite different than those who qualify for disadvantaged funds under the Vocational

*While stipends are allowed under subparts of VEA, such funds must come out of the basic grant and many districts are reluctant to use them for this purpose.

Education Act.* Title I is by regulation limited to those schools within a district having a higher-than-average concentration of poor children. Area vocational schools and vocational high schools often serve a mixed population and therefore do not qualify for Title I funds. Furthermore, until very recently, a large proportion of Title I funds were directed to the elementary level. Thus, this section examines only issues of cooperation between special educators and vocational educators and between sending schools and area vocational schools. Both are focused at the secondary level.

Despite the reliance in many places on the IEP process for identifying handicapped students for vocational education, the actual coordination between special educators and vocational educators in developing a plan for and then teaching handicapped students varies. In the past, a major point of contention in many school districts was the extent of participation of vocational educators in the IEP process. The frequent complaint was that vocational educators were not involved and that the special educators and other members of a student's diagnostic and planning team were making assignments to vocational education without consulting vocational educators. As a result, vocational educators argued, vocational education was being used as a dumping ground: assignments were being made without an adequate assessment of student capabilities and interests in the assigned occupational area.

The problems between vocational and special educators appear to stem from two factors: each group's lack of knowledge of the other's field of expertise and the absence of a formal procedure for involving vocational education in the IEP process. Many vocational educators do not understand the problems of special education students and have no strategies for teaching them. As a result, they are reluctant to have them in their classes. On the other hand, because special educators do not typically understand the components of and skills required for different occupations, they may place students in programs inappropriate to their interests and capabilities. A number of states in our sample are attempting to address this problem with state agency-sponsored in-service training including sensitivity and awareness sessions. State colleges and universities are beginning to establish courses

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*This may change as a result of the 1978 Education Amendments and proposed regulations for Title I.

which deal with special education and vocational education. Some states are instituting joint credentialing processes.

The second factor which leads to difficulties in coordination is the absence of a formal procedure for involving vocational educators in the IEP process. Where good coordination has occurred, it has tended to result from characteristics of the local district: the personalities of the individuals involved, the structure of the district and the attitudes in the school toward both special education and vocational education. Fortunately, many states in our sample have issued or are developing formal policies on the involvement of vocational educators in the IEP process by defining each party's roles and responsibilities. As these are put into practice, the dependence of coordination on local factors which vary considerably among districts will hopefully diminish.

The problem of coordination between the home school and the area school was heard less frequently among our respondents than concern about coordination between vocational and special education; but where coordination did fail, it posed serious problems for academically disadvantaged as well as handicapped students. In a few districts in our sample, respondents told us that students were sent to the area school with no mention of special needs, even though those needs were recognized in the sending school. The area school was then left to discover which students needed assistance, a process which sometimes took months during which time the student fell further behind in his work. In these situations, some respondents believed that the sending school uses the area school as a dumping ground for its problem students. Area school staff complained that they did not have the special education resources needed to do their own independent assessments. They also feared that if the enrollment of special needs students in the area school was too high, regular students would not attend.

6.3.3 Mainstreaming

The 1976 Education Amendments place emphasis on modifying existing vocational programs for special needs students rather than creating separate programs. The rationale for this emphasis was the Senate committee's concern with the GAO finding that vocational education administrators were taking literally the requirement that VEA set-aside funds be used for students who

cannot succeed in regular vocational education, and as a result automatically segregating students. P.L. 94-142 also mandates that services be provided in the least restrictive environment. The term "least restrictive environment" is frequently interpreted as a mandate to mainstream students, that is, to educate them in a class with regular students rather than in a separate class.

In contrast with these policies, the regulations which interpret the 1976 Amendments contain an apparent disincentive to mainstreaming in the rules governing the uses of the handicapped and disadvantaged set-asides. As described earlier, when special needs students are mainstreamed, districts can apply federal set-aside funds only to the costs of providing additional services. However, when special needs students are instructed in separate, specialized classes--i.e., with no non-handicapped and no non-disadvantaged students--districts can apply the set-asides against the full cost of the program.

As stated earlier, it was beyond the scope of our study to analyze systematically the use of federal set-aside funds to determine if the different matching policies did act as a disincentive to mainstreaming. It was also beyond the scope of the study to analyze the enrollments of special needs students in separate-versus-mainstreamed vocational education classes to determine what proportions and types of special needs students are being mainstreamed. However, from the accounts of the vocational educators in our sample, the practice of serving special populations with supplementary and supportive services in regular vocational programs--with the exception of programs for the severely mentally retarded--is reportedly increasing.

There is no evidence that the policy of reimbursing separate programs at a higher rate has served as a conscious disincentive to mainstreaming: No one spoke of this policy as creating a conflict or of deciding to create separate special needs classes, particularly to obtain a higher level of federal funding. To the contrary, state administrators report moving away from separate programs, at least among those special needs programs defined and/or sponsored at the state level. In a number of states in our sample, the set-asides and, in some cases, Subpart 4 money are used to fund similar programs across the state. In the past, the majority of these state-defined programs were separate, class-size projects. Over the past few years, these separate programs have become less prominent. They have not been eliminated, but no longer represent the major use of VEA handicapped and disadvantaged funds in

these states. Many states leave the definition of the use of the set-asides to locals. Others structure the distribution of funds in a way which lends itself to mainstreaming. One state, for example, uses the majority of its set-asides for supplementary services. The program is targeted to individual determinations of what special services are needed; examples of services offered include special equipment, tutors, and interpreters. Another state, which distributes its VEA funds on the basis of claims for reimbursement tied to individual students, distributes the major portion of its set-asides by reimbursing schools at a higher rate for special needs students. This approach of claiming reimbursement for specific students would appear to lend itself to special populations who are enrolled in regular programs but require additional services.

The question of mainstreamed or separate vocational classes appears to be a larger issue with handicapped than disadvantaged students. Disadvantaged students are reportedly served most frequently in regular programs supplemented with remedial or tutorial instruction. The one situation in which separate programs for disadvantaged students predominate are programs for students at great risk of dropping out of school. These students are frequently enrolled in a separate, highly structured work experience program. The rationale for organizing separate programs for these students is that the programs offer the last hope of keeping the student in school: Potential dropouts are often so disaffected with the regular school programs that the regular programs contain no incentives for the students to continue.

The question of mainstreaming is also a bigger issue for mentally than physically handicapped students. With the physically handicapped, often all that is required to enable the student to succeed is the modification of equipment or, in the case of blind or deaf students, the provision of a reader or interpreter. While vocational educators still must deal with questions of the expense of the modifications and fears among instructors for the students' safety--both of which are significant barriers to serving physically handicapped students in any vocational programs, mainstreamed or separate--there seems to be less concern among the instructors about the students' being prepared for the course or about the instructors' ability to teach them once they are in the course than there is with mentally handicapped students.

With mentally handicapped students, special educators as well as vocational educators feel that some students have such severe handicaps that they cannot succeed in a regular classroom, even with added support services. A number of schools we visited are attempting to address the issue of mainstreaming for mentally handicapped students through adaptive or transitional classes. Typically, special education students who have been in separate classes for their academic education are given their first vocational course with that same, separate group. The rationale for this approach is that the students need to be moved gradually to regular programs; if they are suddenly plunged into a course with regular students after having been in classes with only other special education students, it is argued, they will stand little chance of success. Thus, the first course is usually exploratory. Students who find an area in which they are interested and competent are then moved to a regular class on a trial basis. If they succeed, they remain in the class. If they do not, they move back to the transitional class to look for another area in which they might succeed. Students who do not progress to a regular program are trained in marketable skills in the separate class.

Thus, vocational educators report movement toward providing special services to handicapped and disadvantaged students in regular vocational programs. They acknowledge, however, that there are still barriers to mainstreaming, including resistance among a number of vocational educators. One concern is that handicapped students are placed in vocational courses indiscriminantly and often are ill-prepared and unsuited for the skills required for the course. As mentioned above, vocational educators fear that students will injure themselves. Vocational educators also argue that when a number of handicapped students are assigned to a single class without additional assistance to the instructor, the instructor is unreasonably burdened, and the regular students neglected. Finally, they argue that handicapped and disadvantaged students are harder to place in jobs than other vocational education students because employers are reluctant to hire them. In a system which rewards high placement rates, this last argument may signal the instructors' concern with their programs' perceived success rate as much as their concern for the welfare of the students in terms of probable job success.

6.4 STATE ACTIVITIES

The 1976 Amendments and accompanying regulations include requirements for state vocational education agencies to perform certain functions in relation to special needs populations. The most prominent functions involve the administration of federal funds, including distributing the set-aside and Subpart 4 funds and reporting on the intended and actual uses of these funds in the state plans and accountability reports. The state agency is also required to evaluate the results of additional services to special needs populations. It is further required, by inference from the directive, that vocational education services be consistent with the plans and standards under the Handicapped Act, as amended (P.L. 94-142), to coordinate with the state special education agency.

Beyond these provisions, the Amendments contain no requirements for state agency activities for special needs populations. Unlike the provisions for promoting sex equity, there is no requirement for full-time state personnel nor an extensive list of functions to be performed.

Despite this minimal set of formal requirements, we found that a number of states in our sample do engage in a variety of state agency activities for special needs populations. Although we did not find in our limited sample a direct relationship between the extent or types of state activity and the level of expenditure for handicapped and disadvantaged students in vocational education, we feel that state activities are an important means of giving priority to special populations.

In this section, we will look briefly at the array of functions which state staff assigned to work with special populations perform. We will also look more closely at two common areas of state activity: efforts to coordinate with other state agencies and efforts to provide assistance to local education agencies attempting to serve these special populations.

6.4.1 State Special Needs Staff

All states in our sample have assigned at least one person to take major responsibility for working with at least one of the special populations. The number of staff and their responsibilities vary considerably among states, however.

The majority of sample states have one or two staff members working with special populations, although a significant proportion have more:

- Three states have one person who is responsible for all special needs populations.
- Three states have one person assigned to work with one special needs population, with the other populations unassigned; one state has no one assigned to work with the handicapped, and two states have no one assigned to work with the disadvantaged.
- Three states have two special needs staff members; one state has one person specifically assigned to the handicapped and one to the disadvantaged, while in the other two states, the two staff members work as a team for all populations.
- Six states have special needs units of three or more staff members; this category includes two states in which state personnel are assisted by a group of full-time consultants who provide training and technical assistance to local districts.*

Interestingly, the number of special needs staff members is not directly related to the size of the sample states. In fact, the only consistent relationship between number of special needs staff and state size is that the three states which have one person assigned to one population with the other populations left uncovered are all large states.

Staff in all but one of the states appear to have no major job responsibilities other than special populations. The one exception is a small state in which the person assigned to special needs is also responsible for guidance and counseling. In analyzing the activities of the special needs staff, states can be categorized into one of two groups on the basis of staff orientation and responsibilities. Assignments to these categories must be separated by target populations, since a few states not only have different staff members dealing with each group but define the responsibilities of the staff members differently. The first category of special needs staff is administrative: In seven states for the handicapped and eight states for the disadvantaged, the major responsibilities of the staff are to review applications

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*Our analysis focuses primarily on activities in the agency designated as the sole state agency for vocational education; in only one state did we have enough information on this topic to analyze other agencies involved in providing vocational education.

or proposals for funding, distribute funds among eligible recipients, and monitor their use. In other words, their major effort is to administer federal VEA funds. The second category is more programmatic, their emphasis being on leadership and technical assistance: In seven states for the handicapped and five for the disadvantaged, the special needs staff spend a major portion of their time in activities which support and actively promote services to these populations. These activities include, for example, issuing policy guidelines and handbooks on special needs populations, providing technical assistance and training to local districts, and working with other state agencies and universities to develop training materials, curricula, and programs. In some states in this second group, the special needs staff handle the administrative tasks as well, while in other states, the administrative tasks are taken care of by the financial staff of the agency. Within the sample states, there is no consistent relationship between the staff orientation to programs or administration and the size of the state or the number of special needs staff.

The mere fact that states can identify particular staff members with major responsibility for special needs populations suggests a certain level of commitment to serving these populations in all 15 sample states. Those states, however, in which the special needs staff not only administer the VEA funds but also provide leadership and technical assistance appear to be making an extra effort to assist local districts in serving handicapped and disadvantaged students in vocational education. In this role, their responsibilties, like the sex equity coordinators', have elements of a change agent. Many vocational educators still need assistance and direction in this area: they are still uncomfortable in instructing special needs students, particularly the handicapped, because they lack a full understanding of these students' problems and capabilities and the knowledge of teaching strategies to work with them. They may also lack ideas about how to use their set-aside and Subpart 4 funds most profitably. To the extent that state agency staff can support local staff in remedying these deficiencies, they are performing an important function in ultimately meeting the needs of special populations.

6.4.2 Activities with Other State Agencies

The state vocational education agency is clearly not the only governmental body administering services--or even vocational education--to handicapped, disadvantaged, and limited English-proficient students. In keeping

with the emphasis in the 1976 Amendments on coordinated planning and service delivery, most state vocational education agencies work with other state agencies, although the extent of the cooperative effort varies both with category of special population and among states.

As at the local level, most joint state agency activity for special needs populations focuses on the handicapped. There seems to be little evidence of extensive communication or joint activity between state special needs staff and state CETA staff around in-school disadvantaged youth. The interchange between vocational education staff and state CETA staff tends to be limited to the expenditure of 6 percent funds and tends not to involve the special needs staff. The 6 percent funds were administered in the sample states by special sub-units within the vocational education agency and, in a number of states, these sub-units had little involvement with the rest of the agency. In some states, there is also contact between CETA and vocational education staff over the 10 percent and 4 percent coordination monies, but this is sporadic and often takes the form of the vocational education agency applying for CETA funding rather than being involved in any joint planning or cosponsorship of activities. There also appears to be little communication with state staff for Title I of the Elementary and Secondary Education Amendments, probably for the same reasons that there is little cooperative effort at the local level: Target schools differ and, until recently, Title I focused almost exclusively on elementary students. For limited English-speaking students, there is probably contact between the state vocational education and bilingual staffs in some states, but we heard virtually nothing about it. Thus, the focus of our discussion on joint activities is on work with special education and vocational rehabilitation.

State vocational education agencies are involved in a variety of joint activities with the special education and vocational rehabilitation agencies, ranging from formal, written interagency agreements to close, informal working relationships among agency staff. Most states in our sample have an interagency agreement governing the delivery of services to handicapped students; others are in the process of developing agreements. Usually the agreement is between vocational education, vocational rehabilitation, and special education (though occasionally another agency, such as the Bureau for the Blind, is added, depending on the state structure). Typically, the agreements clarify

each agency's areas of responsibility for service delivery to these clients in order to avoid duplication or gaps in service. Standing alone, as they do in some states, this type of written agreement constitutes the most limited level of joint activity. In a few states, the written agreement goes further and becomes a master plan or policy statement for coordinated efforts.

In a number of sample states, staff from vocational and special education (and very often vocational rehabilitation) review--or even participate in the development of--the policy guidelines which each agency issues to its local service delivery system. A key policy decision in these reviews is frequently the addition to the special education policy of a specified role for vocational educators in the IEP process; in several states, the vocational education staff felt that their participation in developing special education policy was critical to success in this area.

In some sample states, the joint policy review is conducted by inter-divisional committees or task forces on the handicapped. These committees also have broader responsibilities for joint planning and, in at least two of our sample states, the committees review all secondary applications for funding for handicapped programs under the Vocational Education Act, the Handicapped Act, and the Vocational Rehabilitation Act.

Many sample states also have joint training and jointly sponsored local projects among the three agencies. Joint training is offered for both state agency and local staff. Most frequently, the training is funded by special education, with vocational educators being invited to attend. In terms of jointly sponsored local projects, many states mentioned projects such as evaluation centers and work experience programs which had been jointly operated by special education, vocational education, and vocational rehabilitation since 1970. In other cases, the examples were of local vocational education projects funded with special education dollars.

Finally, in several states, state vocational education and special education staff describe close personal working relationships that go beyond specific assignments to task forces or sponsorship of particular activities. These staff talk with each other frequently to share ideas and thus informally coordinate, learn from one another, and help each other plan. In one state, the vocational education special needs person told us that his working relationship with the special education staff was so close that they even socialized together. In another state, a vocational education staff member and a

special education staff member worked particularly closely because during at least one of many recent state reorganizations (when vocational education was dissolved as a separate division), they were assigned to the same unit.

Thus, in many states, there is an effort at the state agency to coordinate efforts for serving handicapped students. It appears that much of this activity predates the 1976 Education Amendments, beginning in 1970 with vocational rehabilitation, but also very much influenced by the passage of P.L. 94-142.

6.4.3 Assistance to Local Agencies

One of the major functions of the state special needs staff with a programmatic orientation, as stated earlier, is assisting local education agencies and other eligible recipients to become aware of the problems and capabilities of special needs students and to develop strategies for serving them. Where state staff are responsible for both handicapped and disadvantaged students, both are covered by this assistance. The two most common forums for state assistance are cooperating with colleges and universities to provide courses, and providing technical assistance and training directly through state staff and state-hired consultants.

In terms of cooperating with colleges and universities, several states use a portion of their VEA funding to support teacher training institutions in providing courses on special needs populations. In other cases, the state agency works with the teacher training institutions to obtain the support and agreement for efforts in this area, but do not directly fund them. Courses on special needs populations are directed both at college students who are preparing to teach and at current teachers who are returning for additional education. Often a series of courses is offered covering a variety of topics ranging from psychological or sociological analyses of the problems to special needs students to methods of teaching these students. Again, there seems to be a heavier emphasis on handicapped than on disadvantaged or limited English-proficient students. Several states have joint or associate credentialing programs in which vocational educators, by taking a series of special education courses, earn a teaching credential in special education, or vice versa for special education teachers.

State staff and consultants provide training and technical assistance themselves through workshops and sessions offered at conferences, by visits to

individual schools, and by the dissemination of policy guidelines and curriculum materials. Most frequently, workshops on special populations are held during larger regional or state conferences for vocational education. Usually formal sessions are held only a few times a year and for a limited period of time (in contrast with a college course, which lasts over a period of weeks). In most states, the state special needs staff also work with the staff of individual districts. The frequency of these visits varies, and in some cases wait for a school-initiated request: One district official told us that he was making heavy demands on the special needs consultant for his region, estimating that he had met with her eight to ten times during that school year by our visit in March. A number of states have issued or are in the process of issuing policy guidelines. At least one state has used VEA funds to sponsor a dissemination center based in one of the state universities. The center collects curriculum materials and descriptions of exemplary practices for special needs students in vocational education. It then distributes these through a regularly issued newsletter, conference programs and exhibits, workshops, and inservice programs.

Like the sex equity coordinators, the special needs staff frequently begin their assistance with awareness training. One state, for example, offered extensive awareness workshops for groups of 40 instructors and administrators in different parts of the state. For two days, staff members from different schools and holding different positions worked in an elaborate role-play scenario to address the problems of serving special needs students in vocational education.

Special needs staff also frequently provide technical assistance related to the administration of the Vocational Education Act. They assist local staff in preparing long-range plans and preparing applications for funding. They also assist the districts in defining and documenting excess costs. Usually these activities take place during the state staff visits to individual schools, but at least one sample state held regional workshops last year on excess costs because the requirement was of such widespread concern.

In some cases, special needs staff also conduct on-site program reviews, usually as part of the overall agency program review process, but occasionally independently.

6.5 CONCLUSIONS

Thus, it appears that the performance of the states in our sample in meeting Congressional intent to serve special populations is mixed: There are some indications of progress but also significant problems remaining in spending the set-asides and, more generally, in providing vocational education to special needs populations.

A major Congressional concern in drafting the 1976 Amendments was the low, and in some cases declining, rate at which the federal set-aside funds were matched by state and local dollars in FY 1973. An analysis of BOAE expenditure data for FY 1978 shows that the set-asides were still matched at a rate considerably lower than that for the VEA grant overall. On the positive side, however, matching ratios for the set-asides appear to be improving. Nationwide, state and local efforts to match the federal set-asides were considerably higher in FY 1978 than in FY 1973. Also, state and local vocational administrators in our sample indicate that the expenditures they report to BOAE to satisfy the federal matching requirements by no means reflect all of the state and local spending for handicapped and disadvantaged students in vocational education.

A second major Congressional concern in relation to the set-asides, and to a lesser extent, Subpart 4, is that federal funds will be returned unspent. The FY 1978 expenditure data show that, in fact, no state in our sample spent all of its set-asides during that fiscal year. In roughly half of the states, the carryover for the set-asides was no greater than the carryover for the VEA grant overall, suggesting that in these states the proportion of funds not spent reflects general administrative practices rather than problems unique to serving handicapped and disadvantaged students. In the remaining states, however, the carryover for the set-asides was larger than that for the total VEA grant, indicating that there may be special problems in spending these funds in these states.

The major concerns among vocational educators in relation to the set-asides are the excess cost and matching requirements. Almost all states in our sample report difficulties in documenting excess costs and in generating the state or local match for those costs. For many administrators these requirements (together with the funds distribution procedures) pose the largest problems of any in the 1976 Amendments. Even in some of the states which

spend a relatively high proportion of their set-aside in a single fiscal year, state administrators report that they are having difficulty. On the other hand, most states appear to be increasing their efforts to overcome these problems. Not only are they increasing the pressure on local districts to spend these monies, but they are providing technical assistance to local districts in defining and documenting costs and in identifying state programs that can be used as a match. Still, there is a long way to go. A number of schools in some states simply do not claim reimbursement under the set-asides because school administrators fear having costs disallowed in an audit and believe that the effort to document their expenditures would be greater than the federal funding they would receive. Other districts use the set-asides, but for very safe and often uncreative purposes.

Another concern among state administrators is the requirement that handicapped and disadvantaged funds be distributed among eligible recipients by formula. This procedure, they argue, results in allocations too small to be of use to local districts and in the distribution of funds to local agencies which do not want the funds and therefore return them unspent. However, at least in our small sample, distributing monies by formula rather than by a project method is not consistently associated with a lower level of spending of the set-asides or Subpart 4.

In terms of delivering services to handicapped and disadvantaged students in vocational education, there are some indications in our sample states that local education agencies, particularly at the secondary level, are becoming more systematic in the definition, identification, and assessment of needs of these populations. At the secondary level, P.L. 94-142 is having a major impact on the way both physically and mentally handicapped students are served: In many schools the IEP process is the basis for addressing the needs of these students. At the postsecondary level, Section 504 is a more salient force: The focus of postsecondary energies for handicapped students tends to be on modifying facilities to provide access for physically handicapped students. To the extent that postsecondary institutions do serve handicapped students other than those with physical handicaps, their identification and assessment of needs tends to be less systematic than at the secondary level because there is no P.L. 94-142 process in place.

The procedures for identifying disadvantaged students and assessing their needs at both the secondary and postsecondary levels are more variable than those for secondary handicapped students. Some districts in our sample identify disadvantaged students through standardized achievement or diagnostic tests given regularly to all students in the school; other districts rely on referrals from individual teachers of students who need additional assistance. Most states in our sample emphasize the academic rather than the economic definition of disadvantage.

Despite the apparent progress in identifying and assessing the needs of special populations in vocational education, problems remain. The needs of limited English-proficient students apparently are not being systematically addressed, unless it is through local initiatives which we did not fully document. Some state agencies are conducting needs assessments and beginning to plan for this group, but no programs seem to be well advanced. Other states appear to be doing nothing for these students. Problems also exist in serving handicapped students. In many districts, the involvement of vocational educators in the IEP process has not been resolved. A number of state agencies in our sample, however, have begun to address this problem by working with the division of special education, and in some cases the division of vocational rehabilitation, to issue policies which clarify the roles and responsibilities of the different groups working with the handicapped. A less frequently mentioned but equally important problem is the failure of sending schools to communicate with the area vocational schools about the status and needs of both handicapped and disadvantaged students.

The vocational administrators in our sample also report progress in increasing the proportion of special needs students served in regular vocational programs rather than in separate classes. While we have no independent evidence (e.g., analyses of enrollments or types of programs funded by VEA) to support or counter these reports, it does appear that state vocational education agencies are using fewer VEA funds to sponsor state-defined separate programs than they did previously. Also, we heard little mention of states or local districts avoiding mainstreaming because separate programs can be reimbursed at a higher rate--for one-half the cost of the full program rather than for one-half the cost of only the additional services provided in a regular program. Finally, it appears from our interviews that disadvantaged and physically handicapped students are more apt to be mainstreamed than mentally

handicapped students. A common approach to serving mentally handicapped students who have received their academic instruction in separate classes is to begin their vocational education in a transitional class--t e students initially take an exploratory vocational course in a class with only other handicapped students; if they do well in one occupational area, they are transferred to a regular class in that program; some students remain in the separate program for the duration of their education.

At the state level, many sample state agencies engage in a variety of state activities to support special needs populations. All states in our sample have at least one staff member whose major responsibility is at least one of the special needs populations. In roughly half the states, these staff members appear to be primarily oriented to administering VEA funds. In the other half, however, the staff place greater emphasis on program issues; for example, sponsoring training and materials development, providing technical assistance, and working with other state agencies to issue policies and sponsor programs for these populations. The staff in this second group appear to work more actively to promote the interests of the special needs students than the staff in the first group, and their efforts appear to provide an important source of support in meeting the needs of special populations.

The state training and technical assistance provided to local districts to assist them in serving special needs populations in vocational education is usually provided either through colleges and universities or directly by state staff and state-hired consultants. In contrast with the extended courses provided by the colleges and universities, the assistance provided by state staff is more frequently short-term, provided in workshops, at conferences or professional meetings, or through on-site visits to individual schools. Through these forums, the state offers awareness training, disseminates policies and curriculum materials, assists districts in administering VEA funds and, in some cases, conducts on-site program reviews.

In working with other state agencies which deal with special needs populations, the special needs staff in vocational education focus most frequently on handicapped students. Their joint activities with special education and vocational rehabilitation range from formal, written interagency agreements to informal, close working relationships.

Policy Implications

The handicapped and disadvantaged set-asides and the Subpart 4 funds are clearly meeting the Congressional intent of targeting VEA funds to these populations and should be retained. Several state administrators admit that without the mandated set-asides they would probably continue to serve handicapped and disadvantaged students, but not at the high level that the current legislation requires.

The impact of the excess cost and matching requirements which accompany the set-asides is less clear. From our study, we cannot determine the extent to which the difficulties cited by administrators are inherent to the requirements and therefore lasting as opposed to being simply functions of inexperience in dealing with these concepts. In the absence of that determination, we recommend that the excess cost and matching requirements be retained on the assumption that the difficulties which the states currently face will diminish as they gain experience in these areas. However, we recommend that the policy of allowing districts to apply federal reimbursement to the full costs of separate programs for special needs students while only applying federal funds to the excess costs of mainstreamed programs be altered. While no one spoke of this policy as a barrier to mainstreaming, it certainly does not serve as a positive incentive either. Congress should consider altering the policy, for example, by supporting separate programs only for the costs above the per-pupil costs in the district of providing vocational education to non-handicapped and non-disadvantaged students. We also recommend that OVAE be encouraged to provide increased technical assistance on these issues to the states and that the states in turn provide assistance to local education agencies. OVAE should also be encouraged to monitor the effectiveness of the revised matching requirements to determine whether its procedures for seeking a waiver are so restrictive that states do not take advantage of the new requirements. Congress should also monitor the set-aside expenditures to determine whether states are indeed mastering the excess cost and matching requirements, or whether those requirements serve as continuing disincentives to the use of federal funds.

Only minor changes are recommended in the service delivery provisions. In terms of the handicapped, the reliance on the P.L. 94-142 process is useful and appropriate; there is no need to create a new process just for vocational

education. There is, however, a need to clarify the involvement of vocational education in the special education needs assessment and planning process. Congress should consider adding language to the Handicapped Act to ensure the involvement of vocational educators in the development of plans for handicapped students in vocational education. For the disadvantaged, where there is no existing standard procedure for identifying and assessing needs, local education agencies should be encouraged to develop systematic procedures, but no single system should be imposed by federal requirements. Such an approach would seem to be overly restrictive and probably not appropriate given the wide latitude allowed local districts in defining disadvantage. To support the emphasis on developing a systematic process locally, however, local education agencies could be required to describe their system in their local application or plan for federal funding. If Congress wishes to continue its emphasis on limited English-speaking students in vocational education, additional federal assistance should be provided to aid states in developing strategies for identifying and serving this population.

In terms of state activities for special needs populations, we recommend that each state be required to develop a plan of what activities state staff are going to perform in the areas of training and technical assistance, coordination with other state agencies, and monitoring local activities. Such a plan would be comparable to the current plan required for sex equity and is consistent with the earlier recommendation of recasting the state plan as a master plan of state agency activities. This recommendation is based on the premise that state activities fill an important function in the delivery of services to special needs populations, but that a federal requirement to hire full-time personnel and to prescribe their activities would be too burdensome and unnecessarily restrictive on state agencies, particularly since a number of states in our sample are already engaging in these activities voluntarily.

CHAPTER 7

FUNDS DISTRIBUTION

7.1 INTRODUCTION

The distribution of Vocational Education Act (VEA) funds within individual states is a policy issue with multiple facets. In fact, none of the major issues we invesigated (i.e., planning, coordination, special needs populations, and sex equity) could be completely separated from the fiscal question of how VEA funds are being used. We have attempted to treat each of these topics in a holistic manner when possible. Thus, important discussions of VEA funds distribution issues are included in the chapters dealing with special populations, sex equity, and CETA coordination. These chapters include discussions of such topics as:

- the mandatory set-aside for full-time sex equity personnel in each state
- mandatory and permissive uses of VEA funds to reduce sex bias
- uses of handicapped, disadvantaged, and limited English-proficient set-asides under Subparts 2 and 3
- uses of Subpart 4 funds for the disadvantaged
- excess costs and matching of VEA set-aside funds for the handicapped and disadvantaged
- distribution of set-aside funds by formula and project methods
- uses of CETA funds to improve joint planning and programming with vocational education programs

In this chapter, we offer a brief introduction to the evolution of the funding provisions of the 1976 Education Amendments and examine several previously unaddressed topics dealing with intrastate distribution of VEA funds. These include: state practices in distributing VEA funds in accordance with federal priorities; funding of new programs; use of local applications; and general problems identified by state and local administrators with respect to the provisions of the 1976 statute.*

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*A separate and extensive study of VEA funds distribution was undertaken by the University of California at Berkeley as part of the overall NIE Vocational Education research effort.

7.1.1 Funds Distribution Provisions of the 1976 Amendments

While the federal-to-state distribution procedure of the Vocational Education Act was retained in the 1976 Amendments, a number of changes were made in the provisions governing distribution of federal vocational education funds within each state. These changes were intended to:

- allow greater flexibility in the types of programs states could support with federal funds;
- direct federal (and state and local) funds to the areas and individuals with the greatest need;
- support the general focus on program improvement; and
- provide state agencies with adequate information about local programs.

In order to increase states' flexibility in spending federal funds and thus promote a system of vocational education responsive to labor market needs and local priorities, the federal vocational education legislation of 1963 and 1968 created consolidated basic grants to the states. At the same time, an increasing number of special purpose programs had been added to the legislation. In the interests of simplifying administration, increasing state and local flexibility, and facilitating state and local planning, these special purpose programs were further consolidated in Part A of the Act in the 1976 Amendments.* (Part B of the Act provides for various programs to be administered from Washington.)

Thus, the 1976 legislation provides for a basic grant to states consisting of two subparts. Eighty percent of the funds are to be used under Subpart 2 for a variety of program purposes, including, for example: vocational instruction; work study and cooperative programs; construction of area vocational schools; and support services for women. The remaining 20 percent of the funds are to be used under Subpart 3 to support program development and support services, including: research; curriculum development; and vocational education personnel training. The law further requires that at least 20 percent of the funds in Subpart 3 are to be expended for vocational guidance and counseling.

The 1976 Amendments maintain the emphasis introduced in the 1963 legislation on serving priority populations in vocational education. In addition

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*There are some exceptions, however, in that special programs for the disadvantaged and consumer and homemaking education programs continue to be funded under separate Subparts.

to maintaining the handicapped and disadvantaged set-asides and the Subpart 4 special programs for the disadvantaged, the 1976 Amendments require that states give priority to needy districts in distributing other VEA funds. Priority must be given to applicants which are located in economically depressed areas and areas with high rates of unemployment and are unable to provide the resources necessary to meet their vocational education needs without federal assistance. Moreover, in determining the amount of funding to be given to each of the approved applicants, the state must use as the two most important factors, in the case of local education agencies:

- the relative financial ability of the agency to provide the resources necessary to meet the vocational educational needs in its area; and
- the relative number or concentration of low-income families or individuals in the area.

From 1963 on, federal vocational education legislation has also been intended to encourage the use of federal funds to improve and expand programs and to make them more responsive to new and emerging occupations. However, with the exception of appropriations for research and exemplary programs, no mandatory requirement to use funds for this purpose was incorporated into the statute. By 1976, the Senate in particular was very concerned that the federal role of promoting expansion and innovation was not being realized. The 1974 GAO report on vocational education was influential; and GAO representatives in their testimony criticized some states' use of federal funds simply to maintain existing programs. While some in Congress argued that federal funds should be used only for expansion and innovation, the 1976 Amendments ultimately included a compromise position. The revised legislation now authorizes grants to assist states to:

- extend, improve, and maintain, where necessary, existing programs of vocational education, and
- develop new programs of vocational education (emphasis added).

In distributing federal VEA funds, the law also requires states to give priority to applicants which propose programs which are new to the area to be served, and which are designed to meet new and emerging manpower needs and job opportunities in the area and, where relevant, in the states and the nation.

Finally, the 1976 Amendments specify requirements for the contents of local applications for federal funding. Congress saw the local applications as:

- a means of providing state agencies with adequate information on which to choose among local agencies in allocating scarce resources, and
- a means of encouraging local applicants to assess all available resources in order to avoid duplication and maximize the use of those resources.

To support these purposes, Congress prescribed in some detail the information which local districts must provide to the state agency in order to receive VEA funding.

Thus, the 1976 Amendments revise the funds distribution requirements of the Vocational Education Act in a number of important areas. In the sections which follow we will examine the extent to which these provisions have been implemented and whether they have achieved their intended purposes.

7.2 STATE PRACTICES IN DISTRIBUTING VEA FUNDS*

7.2.1 Setting Priorities for Uses of VEA Funds

As described above, Congress wished to build a funding structure which would achieve two primary goals: to assure that federal priorities were addressed at state and local levels, yet allow states sufficient flexibility to meet their own priorities. In this section, we examine the degree to which these somewhat competing ends have been met in our sample states.

With the consolidation of nine categorical programs into four broad subparts in the 1976 legislation, states, in theory at least, should have greater flexibility in decision making within the legislatively established boundaries. Although each Subpart has specific requirements on how funds may be used, states may now choose to support local program activities based on state-identified priorities and needs. Congress wanted such factors as local and state labor market needs and student interests and abilities to influence program funding decisions.

According to our sampled state officials flexibility in decision making has not increased as a result of grant consolidation. If anything, they say, there are fewer optional decisions for the state to make than under pre-

*State practices in allocating funds to special target populations are discussed in the chapter on special populations. Funding of programs to reduce sex bias and sex-role stereotyping are addressed in the sex equity chapter.

vious Acts. They point out that the mandated distribution criteria essentially dictate where federal money should go within the state. The officials also state that the increase in mandated set-asides has limited the amount of discretion they have in funding local programs. Further, matching the excess cost of vocational programs for the handicapped and disadvantaged has effectively tied up any uncommitted state and local funds.

Only in the use of Subpart 2 funds is there flexibility. States can and do reserve portions of the basic grant for such purposes as new programs, equipment maintenance, adult programs, area vocational technical schools, work-study, cooperative education, and the like. The funds in these reserves, or funding pools as they are often called, go out to applicants according to the funding criteria. States express their priorities through the reserves and communicate these priorities to local education agencies (LEAs) by informing them of the purposes against which they can apply.

Most commonly, states have created pools of VEA funds to meet both federal and state priorities. These pools may be established by purpose or by type of institution, and represent a recategorization of federal funds at the state level.* Such reordering is an appropriate function of each state board for vocational education and has been approved by BOAE in recent policy memoranda.

The following four examples (see Figures 7.1 through 7.4) illustrate various ways in which funding pools can be used. The way states recategorize VEA Subpart 2 grants varies broadly from state to state; the states' objectives and priorities also vary.

Example I

This state has chosen to fund only postsecondary-level institutions with VEA Subpart 2 grant funds. After allocating the National Priority Program set-aside funds among eligible recipients, the balance of the federal grant is divided into two parts--one for programs and the other for equipment purchases. The program category is subdivided into two categories: to provide support for ongoing programs and to fund new vocational programs.

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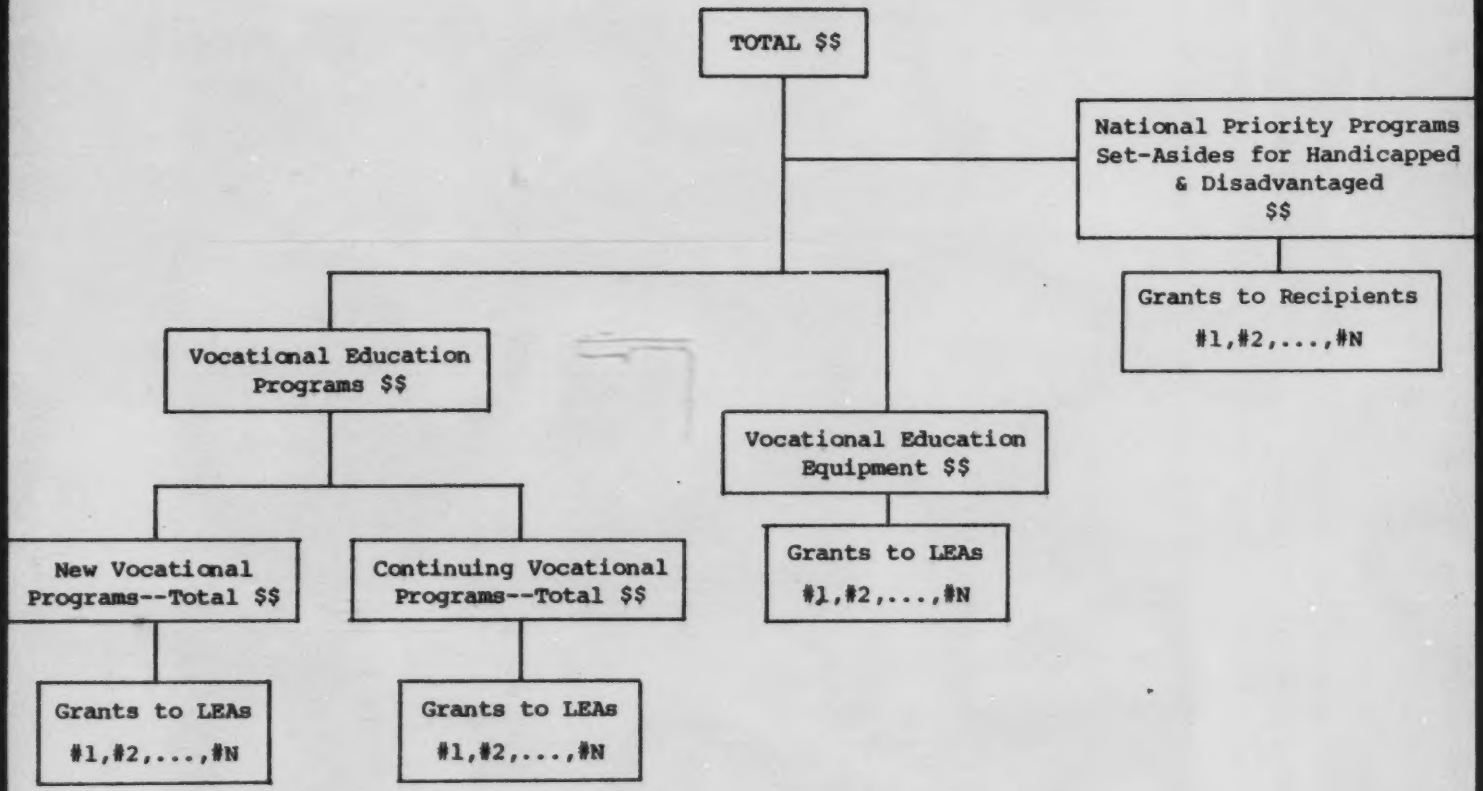
*In effect, the creation of funding pools is the same tack taken by Congress in mandating the 80/20 percentage split between Subparts 2 and 3, various set-asides, and the special subparts for the disadvantaged (Subpart 4) and consumer and homemaking education (Subpart 5).

Figure 7.1

EXAMPLE I

VEA SUBPART 2 GRANT


TOTAL $$
National Priority Programs Set-Asides for Handicapped & Disadvantaged $$
Grants to Recipients #1,#2,...,#N
Vocational Education Programs $$
Vocational Education Equipment $$
New Vocational Programs--Total $$
Continuing Vocational Programs--Total $$
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N

*Only postsecondary institutions receive Subpart 2 VEA funds.

Example II

In this state, the state board for vocational education allocates the National Priority Program set-asides among local agencies and for statewide programs. The postsecondary set-aside is divided into two pools; these funds are distributed among postsecondary institutions according to ability to pay and presence of high-cost students. At the secondary level, funds are divided into two portions: one for comprehensive high schools and the other for the area vocational centers. Thus, only comprehensive high schools compete for one pool of VEA dollars, and only centers compete for the other.

To encourage secondary institutions to provide a comprehsive vocational program, funds are again recategorized into vocational program pools; only schools which offer Program "A" will be funded from the Program "A" pool, and so forth. Thus, a local agency must offer a diversity of programs to receive funds from all program categories. This state also varies the amount of funds allocated to each program category with the result that high-priority programs receive a higher reimbursement than low-priority programs.

Example III

This state exemplifies the most complex Subpart 2 recategorization scheme among our sample states. Handicapped and disadvantaged set-asides are distributed separately. The remaining funds are then divided into two pools--one for secondary institutions, and the other for postsecondary institutions. At the postsecondary level, this pool is subdivided into two pools: for regular postsecondary programs and for adult programs.

The secondary level recategorization allocates the funds among six different purposes, including:

- continuing secondary programs
- adult programs in secondary schools
- secondary equipment
- local travel
- postsecondary programs in secondary schools
- new programs

Thus, funds are then distributed to qualifying local agencies according to these state priorities.

Figure 7.2

EXAMPLE II

VEA SUBPART 2 GRANT

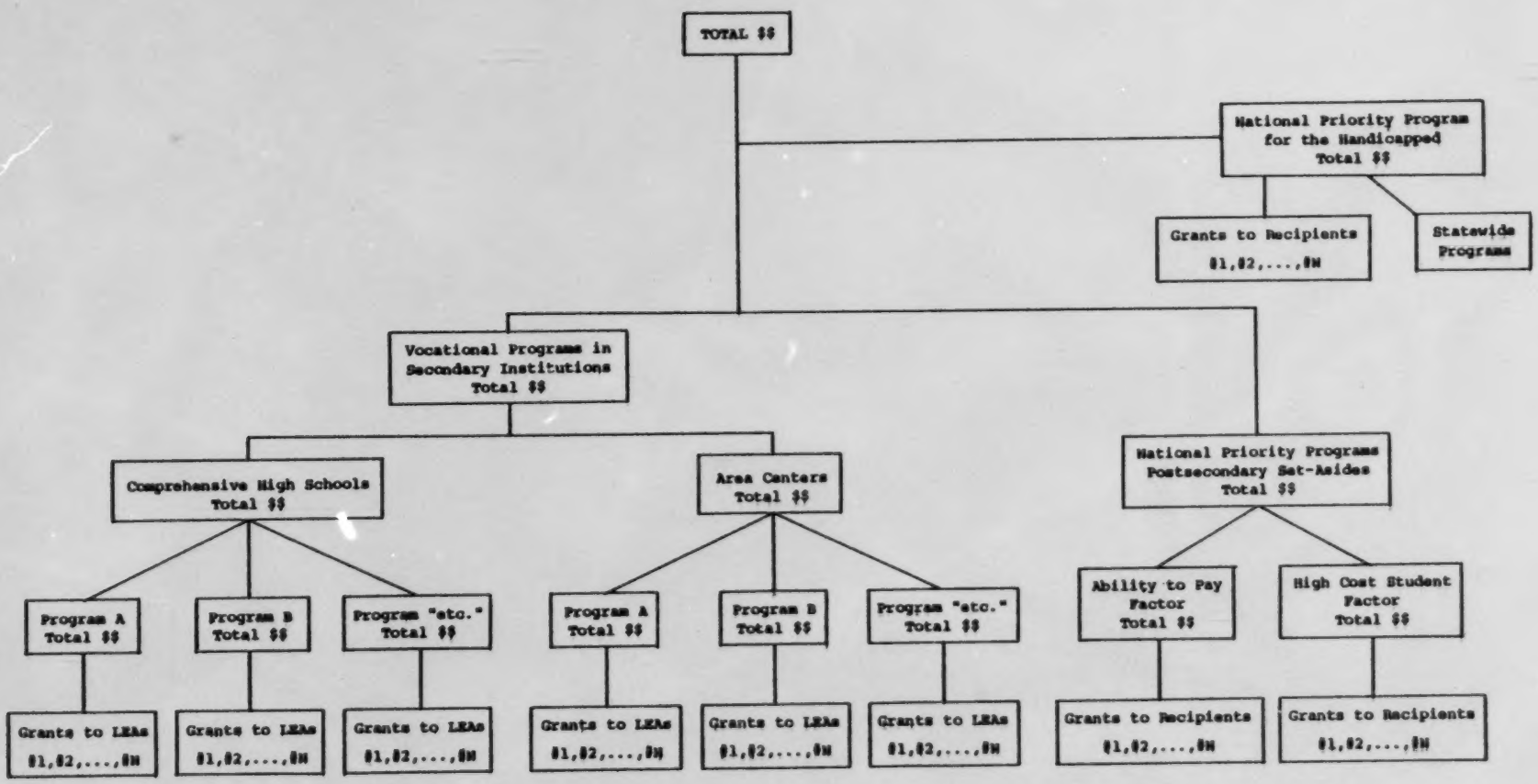
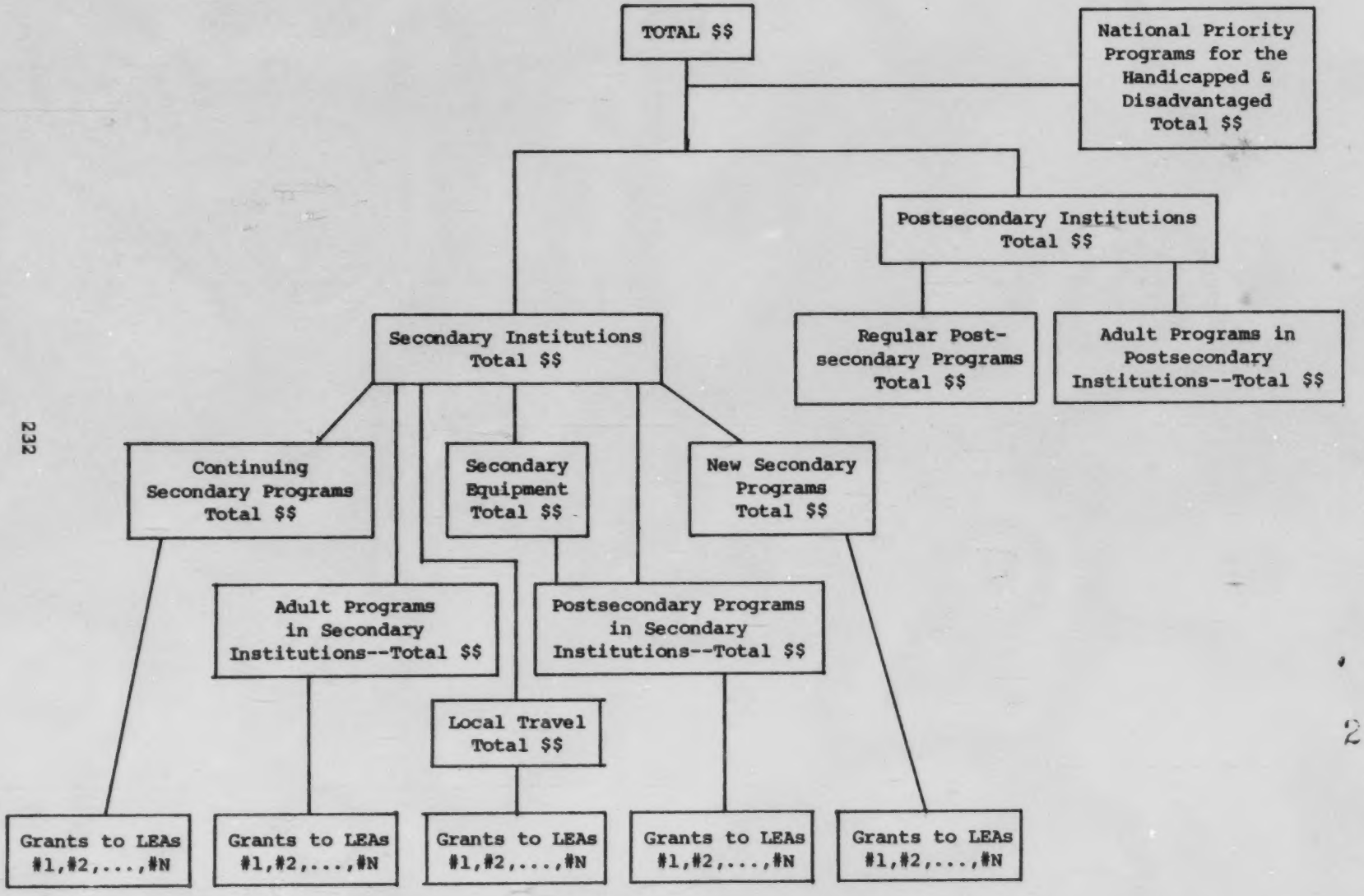

TOTAL $$
National Priority Program for the Handicapped Total $$
Grants to Recipients $1,$2,...,$N
Statewide Programs
Vocational Programs in Secondary Institutions Total $$
National Priority Programs Postsecondary Set-Asides Total $$
Comprehensive High Schools Total $$
Area Centers Total $$
Program A Total $$
Program B Total $$
Program "etc." Total $$
Program A Total $$
Program B Total $$
Program "etc." Total $$
Ability to Pay Factor Total $$
High Cost Student Factor Total $$
Grants to LEAs $1,$2,...,$N
Grants to LEAs $1,$2,...,$N
Grants to LEAs $1,$2,...,$N
Grants to LEAs $1,$2,...,$N
Grants to LEAs $1,$2,...,$N
Grants to LEAs $1,$2,...,$N
Grants to Recipients $1,$2,...,$N
Grants to Recipients $1,$2,...,$N

Figure 7.3

EXAMPLE III

VEA SUBPART 2 GRANT


TOTAL $$
National Priority Programs for the Handicapped & Disadvantaged Total $$
Postsecondary Institutions Total $$
Secondary Institutions Total $$
Regular Post-secondary Programs Total $$
Adult Programs in Postsecondary Institutions--Total $$
Continuing Secondary Programs Total $$
Secondary Equipment Total $$
New Secondary Programs Total $$
Adult Programs in Secondary Institutions--Total $$
Postsecondary Programs in Secondary Institutions--Total $$
Local Travel Total $$
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N
Grants to LEAs #1,#2,...,#N

Example IV

This example shows a unique distribution procedure at the postsecondary level. The state secondary agency distributes the secondary-level funds for programs after removing the handicapped and disadvantaged set-aside for a separate distribution procedure. In this case, a funding formula was used to distribute program funds, while a project method was used to distribute set-asides to selected applicants.

The postsecondary portion of Subparts 2 and 3 of the VEA grant (about 60 percent of the funds), however, are distributed to eligible applicants by different procedures. These funds are sent out as block grants; the recipient reapportions its block grant according to criteria contained in the Act. Hence, every institution targets 20 percent of its grant to the disadvantaged and 10 percent to the handicapped; each directs 80 percent of its funds for Subpart 2 purposes and 20 percent for Subpart 3 purposes. In effect, every postsecondary grant becomes a miniature of the state and is expected to respond to the federal priorities without regard to differences in local institutional characteristics.

Thus, through the use of funding pools, states have tailored the distribution process to serve their own goals and priorities. While most states have attempted to accomodate the federal priorities simultaneously, the question remains as to whether states' attempts to achieve flexibility runs counter to federal targeting objectives.

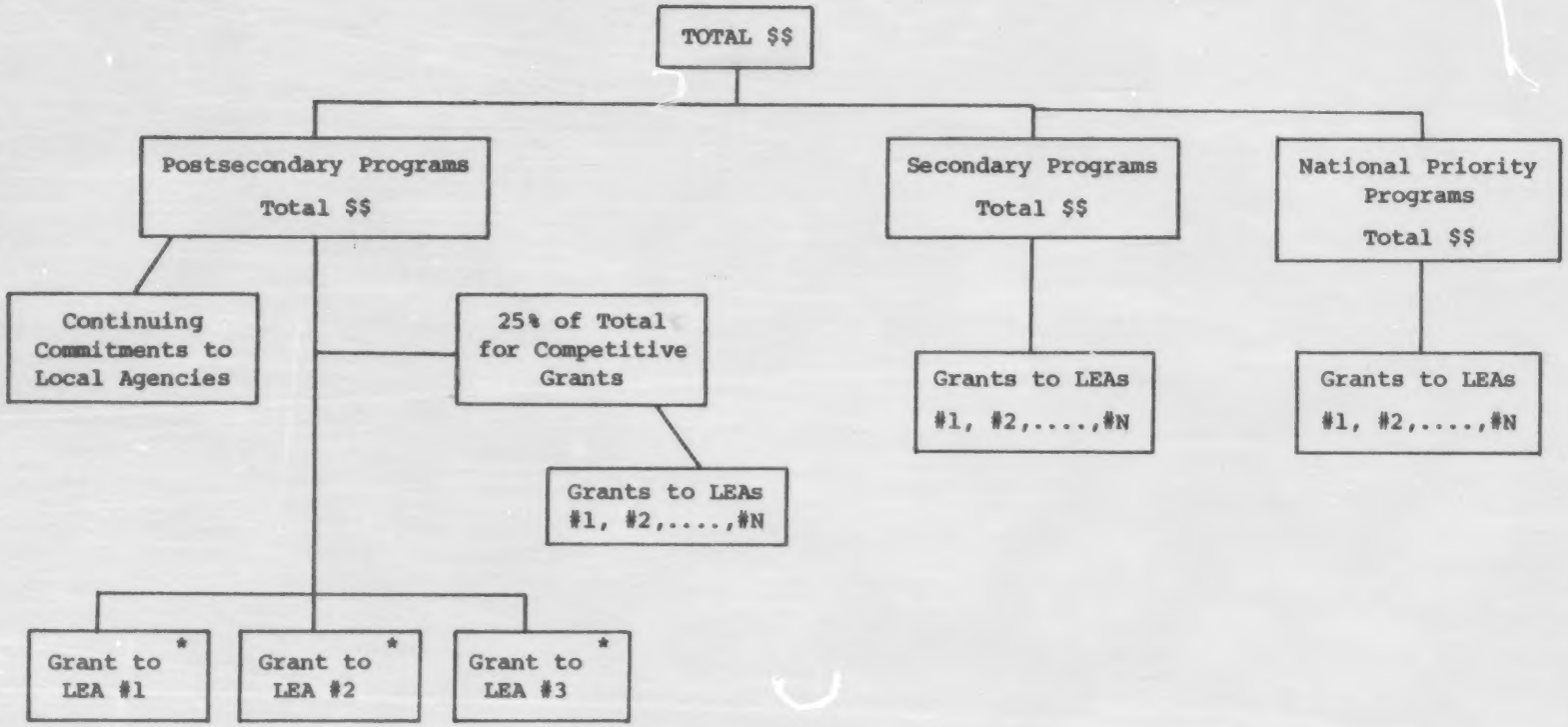
As previously mentioned, Congress intended that VEA funds would be distributed to local agencies based on various criteria, the two most important being relative ability to provide the resources needed and the number or concentration of low-income individuals or families. Congress also required that priority be given both to those applicants located in economically depressed areas and those who propose new programs.

As discussed in the next section, every state has developed ways of meeting the mandate to develop new programs, even though some states have found this focus of the Act inappropriate for their needs. However, it is less obvious that states have been finding appropriate methods of targeting funds to the most needy applicants. The maze of procedures used to fund local agencies, including the recategorization of VEA funds into special purpose pools, makes it impossible to determine, with any degree of confidence, whether states are in compliance with this requirement of the law.

Figure 7.4

EXAMPLE IV

VEA SUBPART 2 (AND 3) GRANTS


TOTAL $$
Postsecondary Programs Total $$
Secondary Programs Total $$
National Priority Programs Total $$
Continuing Commitments to Local Agencies
25% of Total for Competitive Grants
Grants to LEAs #1, #2,....,#N
Grants to LEAs #1, #2,....,#N
Grants to LEAs #1, #2,....,#N
Grant to LEA #1 *
Grant to LEA #2 *
Grant to LEA #3 *

*Each postsecondary institution must apportion its total VEA grant along the lines of the law; i.e., 80% for Subpart 2 purposes, 20% for Subpart 3 purposes. Further, the 20% set-aside for the disadvantaged and the 10% set-aside for the handicapped population must be adhered to. Each institution was also required to, individually, give priority to using federal funds for new programs.

It is possible for states to use funding pool restrictions to distribute VEA funds counter to the mandated specifications. Hypothetically, if a state wishes to give preference in funding to one type of LEA over another, it can do so by making the pool for one type of institution proportionally larger than the pool for another. Hence, while using the same formula to distribute dollars to various institutions throughout the state, the actual result may be that federal dollars are not distributed according to the two most important Congressionally mandated factors at all. The most important element in the allocation pattern may very well be institutional type or some other restrictive pool factor. Thus, in a state where only area centers may qualify for federal support for equipment purchases, it would appear that "relative ability" is narrowly defined to mean "relative ability among like local education agencies." Thus, funding pools carry the danger of appearing to distribute VEA funds using the legislative criteria, while the actual distribution may be based on other factors.

Our review of state plans, accountability reports, and interviews with state officials suggests that this hypothetical illustration may well reflect reality. Some states appear to allocate disproportionately more VEA dollars to area vocational centers than to comprehensive high schools offering vocational programs even though the schools are in the same geographic area. As has been pointed out in our analysis of distribution patterns, one state uses 100 percent of the VEA allocation at the postsecondary level, even though there must be some needy secondary schools in the state. These practives have not been viewed as inappropriate by BOAE because, in the opinion of BOAE officials, the law permits such targeting to specific types of institutions. Such a position may be the only defensible interpretation of the law as presently written. It will be necessary to wait for the Berkeley report on state distribution of VEA funds to learn more about the actual consequences of funding pools on actual distribution of monies among eligible recipients.

7.2.3 Giving Priority to New Programs

Definitional Issues

Shortly after the law went into effect, several states adopted a rather narrow definition of the "new program" requirement. For some states,

the definition was so narrow that virtually nothing qualified. One state in our sample established a "moratorium" list of occupations which, according to the latest statewide projections, were in over-supply. For one year, local education agencies were not permitted to use VEA funds to support existing programs or to start new programs in these occupational areas. This hardline approach led the state to disapprove welding programs when, in fact, there was a high demand for welders in certain parts of the state because of new industry. As a result of the heavy criticism it received, the state agency reconsidered its policy. Now the state agency issues only a list of programs which are in under-supply and therefore are to be promoted. There is no moratorium list of occupations which the state agency will not fund.

In another state, where starting new programs is a very high priority, we talked with a local vocational administrator in a large school district who questioned the state's emphasis on new programs. "We've always had plenty of money for new programs," he told us. "What we've never had is enough money to maintain the quality of ongoing programs. We can get funds to start a small new program to meet a short-term need of business or industry and in three to five years we will have to drop it because we've glutted the local labor market."

In six states, we were told by state administrators that the requirement had little real meaning for their state. It was felt in these states that declining student poulation and dwindling support for all state programs precluded starting new programs in all but the most pressing occupational areas. Thus, the provision to start new programs was operationalized in a limited way in these states.

One state official complained that there was no possible way for states to monitor this provision. Local agencies were continually changing course titles, and the vocational emphasis in every course changed from year to year. Each year, hundreds of new courses were added by local institutions. In his opinion, few state agencies were staffed to handle a close review of each local application to make clear judgments about the "newness" of each course.

The ambiguities of the law and regulations in defining new programs have probably deterred some states from moving to pass this requirement on to the local agency. Most of the state agencies we visited had chosen simply to

quote the law and regulations and take the broadest possible view of the mandate. That is, new programs are defined as those which either have never been offered at the local agency before or are substantially new programs because major revisions have been made in an existing program. Ensuring that the new program be related to "new and emerging occupations" is usually a local responsibility, although many states require that a thorough needs assessment be conducted.

Procedures for Giving Priority to New Programs

While all states were allocating federal funds to new programs, each sample state used a different method. Perhaps the most common mechanism, often used in conjunction with other methods, was requiring that all local agencies give priority to funding new programs with their VEA allocation. Eleven states in our sample of 15 used this method to some extent; most augmented it by providing a variety of additional funding incentives. For example, seven states used a special factor in the funding formula to give an additional reimbursement level to all new programs. Two states included in the formula a need factor which gave added weight to districts located in economic growth areas. This was done, we were told, on the grounds that starting new programs was feasible only in growth portions of the state.

Seven states used a project method to assure that federal funds were drawn on new programs. The project method consists of preparing a special proposal for federal funding. Local agencies typically must prepare a special application which describes the new program and the students to be served, and provides a detailed budget indicating sources of all funding. Two of these states have set aside pools of money for this purpose solely. The project approach assures that new programs will be funded without competition from ongoing programs.

Several sample states responded to the new program mandate by using VEA funds to purchase specific goods and services to keep a program current with industry standards. Thus, curriculum materials, new equipment, teacher inservice training, and research are supported as a high priority with federal funds. The rationale behind this approach is that a "new" program is one which is continually revitalized and updated. We found five states that spent a large portion of their Subpart 2 monies on major equipment for updating

vocational programs. We also found three states which used federal funds to provide program renewal through supporting inservice training activities by paying instructor travel costs. State officials consider both of these methods appropriate approaches to give new programs the emphasis Congress intended.

Barriers to Giving Priority to New Programs

One state director felt that the best approach to implementing new programs was to provide local vocational education agencies with high quality instructional materials in new program areas. However, the lack of curriculum and instructional materials was considered by many to be a barrier to establishing new programs. Another state official indicated that several local education agencies had tried for many years to establish selected new program offerings; their major problem was attracting qualified instructors in these vocational areas.

In still another state, a local vocational director told of trying for three years to begin a new machine shop program. They had a qualified instructor, a well-equipped shop, adequate supplies and, most importantly, strong support from local businesses which were experiencing a shortage of qualified machinists. Only one element was lacking in an otherwise perfect match between the local labor market and the school's vocational programs--students could not be persuaded to enroll in the program. Thus, after three years of low student enrollments, the program was dropped.

Moreover, not everyone sampled was enthusiastic about the emphasis on new programs. One assistant state director summarized the feelings of many state officials concerned with their attempt at implementing the new program provisions of the 1976 Amendments. "We have spent 90 percent of our time worrying about 10 percent of the legislation. As a result, we've been guilty of neglecting ongoing programs," in quest of new ones.

7.2.3 Local Applications

Congress saw the local application as a means of assuring that state agencies had sufficient information on local programs to make hard choices among competing applications for scarce federal funds and to encourage local applicants to assess all available local resources to avoid duplication of programs. Thus, the 1976 Amendments require that local applications include:

(1) an assessment of local needs and a description of how the proposed program will meet those needs; (2) a description of how the proposed program ensures coordination with manpower programs established under CETA; and (3) a description of the relationship between VEA-funded activities and those supported by state and local funds. Moreover, the application must contain assurances of broad-based participation in its development and a description of how the results of previous evaluations have been incorporated in the planning process.

Our analysis of local application requirements, as described in the state plans for the 15-state sample, suggests that local application requirements continue to be relatively weak and compliance-oriented. Our case study interviews suggest that some states do require additional documentation from eligible recipients beyond that which must be included in the local application. For example, three of the sample states insist upon long-range education plans, in addition to annual applications. Generally, however, states could further strengthen the local application process from requiring additional information from the local education agency.

The actual local application or the required contents of the local application was contained in the five-year or annual state plan for 14 out of 15 sample states. Several states had separate applications for levels or types of vocational programs; i.e., secondary, postsecondary, adult, or discipline. Other states had a basic, multipurpose application augmented by forms for specific purposes such as new programs or programs for the handicapped or disadvantaged. We found a great deal of variability in the required contents of these applications, even within the same state.

In our sample, states generally require the local education agency to assure that the regulations will be met. For example, one application simply stated:

> The local education agency shall provide necessary information to meet the requirements of section 104(a)(4) of the Act. (California, 1977)

Other applications reproduced the regulations verbatim. The application form contained in a few state plans failed to mention any of the mandated requirements. Some states required elaborate descriptions of programs, needs, etc., in the annual application, but most did not. For example, based on the information provided in state plans,

- Only one state required that the applicant describe how the representatives of education and training agencies in the area to be served were involved. (Four did not require this assurance of the local education agencies.)
- Thirteen of the 14 states required an assurance that advisory council members had been involved in preparing the local application. Only a few states required that the application describe how the local advisory council on vocational education had been involved.
- Eleven states required that the applicant give assurance that the results of evaluations ahd been used to develop the proposed programs. Only four states required the applicant to describe how this was done.
- Only one state required the applicant to describe how the programs proposed related to area CETA programs; four were required to show the relationship between federally and state or locally sponsored programs.
- Only six states required that the local applicant describe narratively the needs of students to be served. Most states, however, collected data on student enrollments and courses to be offered.
- While most states require that programs supported with VEA funds be related to realistic employment opportunities, only one state required that the applicant describe the local economic or employment situation. Our experience indicates that many states, however, require the local education agency to collect and analyze these data through a variety of methods including employer surveys, labor market projections available from the United States Employment Service, the Chamber of Commerce, and local employer contacts.

We again stress that states may be collecting additional data on local education agencies and their programs. This analysis, however, suggests that states have not necessarily fulfilled Congressional intent with respect to making the local application per se a meaningful tool for purposes of allocating funds among eligible recipients. States could easily strengthen the local application process by requiring additional information and by changing the focus from assurances to the development of a local plan. Of course, strengthening the local application is justified only if it is utilized as a source of data in decision making (and/or monitoring activities). Based upon our analysis of state funds distribution, it appears that other factors--state program priorities and Congressionally mandated distribution criteria--play a greater role in state funding decisions. Indeed, many states allocate VEA funds to all eligible applicants on the basis of formula criteria.

7.3 STATE AND LOCAL ADMINISTRATOR PERCEPTIONS OF THE FUNDING PROVISIONS OF THE 1976 AMENDMENTS

As mentioned, the Education Amendments of 1976 made substantial changes in the procedures for distribution of federal VEA funds by states. One means we used to determine how these changes had affected states was to simply ask state and local vocational educators whether certain provisions of the law or regulations had been particularly troublesome and how vocational programs, services, or administration had been affected by these changes. The responses varied within states and also across states, as described below.

Every state in our sample has changed its distribution procedure at least once since FY 1978. Some changes are minor--fine-tuning the technical aspects of the funds distribution procedure--but most states have experienced major modifications in the way federal funds are distributed among eligible recipients. Two states have modified the funding process every year since the five-year plan was prepared and approved. In one of these states, an administrator challenged "any federal official to devise a system to distribute the VEA money, based on the criteria in the law, regulations, and the directives we've gotten from Washington." Officials in several other states agreed.

In several states, we learned of state staff concerns that provisions of the 1976 Amendments had resulted in diminished state control over vocational programs. One such concern was that the approved allocation formula really does not put VEA money where it can (or will) be used most effectively to achieve the purpose of VEA. The most commonly repeated example was that of allocating funds to local education agencies which, year after year, were unable to get programs started and, therefore, returned large amounts of federal funds at the end of the year.

Another complaint was that the formula allocation procedure led local agencies to believe that VEA funds were an entitlement with few strings attached. As a result, the state agencies feel that they have little control over the use of the funds. In an effort to regain control, state agencies have used various methods of earmarking and procedures for tracking recipient spending. Two states also pointed out that distribution of VEA funds by formula resulted in trivial allocations which were almost useless to the agency.*

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*A further discussion of this problem is contained in the funds distribution section of the special populations chapter.

Other respondents pointed out the inequities of using strict mathematical formulae to allocate the funds, because of the variation in the level or quality of data used to generate the local allocations. One state director explained the problem: "In a county with two school districts, one rich and one poor, the poor district is likely to have the higher unemployment rates. By using county-wide data, we can't take this into account, and the poorer district will probably receive less than it should and the richer district more than it should."*

These problems are exacerbated for some sections of the law. Funds for Subpart 4, Special Programs for the Disadvantaged, for example, are targeted for areas with high rates of youth unemployment. In practice, we were told, it is impossible to get accurate figures on youth unemployment for any level, including the state, much less local school districts. Thus, the state is in the position of making estimates of youth unemployment, knowing very well that their figures are likely to be inaccurate. One state administrator explained that if eligible recipients were to challenge the state's allocation of VEA funds, it would be most embarrassing because of the data upon which local allocations are made.

In some states, we found that state staff felt the law and the regulations had severely restricted their ability to meet the overall needs of the state. Staff in six states felt that the 80-20 split between Subparts 2 and 3 was artificial, restrictive and meaningless. It kept these states from using the money to meet perceived needs; two states saw it as bookkeeping nonsense. A state director complained that "we can send the money out that way," but "it is hard to get actual expenditures to come out right." This state had often found it necessary to reallocate some funds to set the percentages right. In other states, administrators complained that the 80/20 split severely limited, and in some cases caused them to cut back, the funds available for guidance, staff development, curriculum development, or exemplary programs.

In two states, the required split had caused some problems in providing support services for the handicapped and disadvantaged. One specific problem cited had to do with finding matching funds for university-based research

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*District-level data on unemployment rates were seldom available for the states in our sample; the county rate was used for all districts within the county.

and development of inservice training for vocational instructors of special needs learners.

In two states, the required split had caused some problems in providing support services for the handicapped and disadvantaged. One specific problem cited had to do with finding matching funds for university-based research and development of in-service training for vocational instructors of special needs learners.

Although state agencies are having few, if any, problems with maintaining fiscal effort statewide, a small percentage of local education agencies find it difficult to maintain fiscal effort. Administrators of a few local education agencies thought this provision was unproductive because it worked as a counter-incentive (1) to expanding existing or establishing new vocational programs because these would have to be supported in the future, and (2) for establishing one-time short-term training programs which were designed to meet a specific training need and then be eliminated from the curriculum. There is a more serious charge by state administrators in two states: The maintenance of effort requirements encourage rigidity in curriculum and instructional techniques and discourage innovative administrative/management practices which might produce better-trained vocational graduates at a lower cost.

7.4 CONCLUSIONS AND POLICY IMPLICATIONS

The major difficulty with the present legislative provisions for distributing federal VEA funds among eligible recipients is that many requirements are unclear or potentially in conflict with others. Although BOAE attempted to resolve these problems through regulations and policy memoranda, confusion remains. While most states in our sample are attempting to work out their difficulties with the funding provisions and to comply with the law, the result of their efforts may not always match federal intent. Consequently, Congress needs at a minimum to clarify both its intentions regarding the uses of VEA funds and the language of the Act governing funds distribution by state agencies in order to provide clear instructions to the states.

More specifically, the vocational education administrators in our sample indicated that the consolidation of the program-by-program funding continued in previous Acts has not given states more latitude in programming. If

anything, states feel they have less discretion than under earlier Acts due to greater earmarking of funds for specific purposes. In addition to the problems with the handicapped and disadvantaged set-asides discussed in the previous chapter, many administrators complain that the 80/20 split between Subparts 2 and 3 is overly restrictive and difficult to administer. To allow states which choose to use their federal funds primarily for program improvement and support services--i.e., the uses allowable under Subpart 3--Congress should consider making the 20 percent for Subpart 3 a minimum rather than an absolute figure.

Administrators also argue that the mandated distribution criteria which are intended to target funds to needy districts and new programs severely restrict state flexibility in the distribution of funds to eligible recipients. Moreover, the distribution criteria are among the most confusing requirements in the 1976 Amendments. BOAE has not issued clear standards for an acceptable formula and in some cases has required states to distribute funds to districts on the basis of nonexistent data such as youth unemployment rates. At a minimum, the federal requirements, either through the law or administrative policy, should be clarified to provide the states with unambiguous guidance for action.

The most common strategy used in the sample states to achieve flexibility to meet state as well as federal priorities in the face of these restrictions is to create funding pools. While our study did not systematically analyze the impact of these pools on the actual distribution of funds among eligible recipients, the use of pools may in some cases lead to distributions which contradict federal priorities, particularly the targetting of funds to needy districts. In our opinion, the general concept of funding pools is an effective strategy for establishing state priorities and we believe that the practice should be allowed to continue. Federal requirements should specify, however, the dimensions on which funding pools are allowable; i.e., those which do not conflict with federal priorities. Pools for new programs or by level of education would appear to be acceptable, for example. However, pools by type of institution may be more questionable because type of institution may be related to district wealth.

The emphasis on new programs in distributing federal funds has also been a source of concern among vocational administrators. Most states in our

sample have found ways to comply with the mandate to support new programs with VEA funds. However, in states experiencing declining school enrollments or fiscal hardships, administrators view the new program requirements as inappropriate. A more pervasive concern has been the lack of an operational definition of new programs. In revising the Vocational Education Act, Congress should consider clarifying the definition. One element of the new definition should be the updating and improvement of existing programs. In some states, administrators feel that any interpretation of new programs which excludes this element is inconsistent with sound educational practices, because it prevents schools from supporting efforts to revise curricula and retrain staff to take advantage of the most recent methods and equipment in their occupational areas.

Another concern about the emphasis on new programs is that it may conflict with the mandate to give priority to applicants in the neediest areas. Currently, most states resolve this conflict by emphasizing one priority at the expense of the other, since the available funds will not fully support both priorities; moreover, they vary as to which priority they emphasize. If Congress finds the trade-offs and the variation among states unacceptable, it should consider choosing one priority over the other or should at least establish a procedure for dividing funds between them. One strategy would be to create a separate pool of funds for new programs, as some states are already doing. If such a pool is required, its size can be determined either by federal requirement, i.e., through the creation of another set-aside, or at the discretion of each state. We do not recommend a set-aside with a specified level of funding because it would be overly restrictive and would not accomodate differences among states in their need for and ability to support new programs. If Congress does decide to mandate a specific set-aside, we recommend that other restrictions on the use of funds, such as the 80/20 split, be eliminated or relaxed at the same time. If Congress chooses to mandate a new program pool but leave the level of funding unspecified, or to simply allow states to create pools at their choice, we recommend that states be required to explain and justify in the state plan their criteria and goals in using these funds.

Requirements to distribute funds on the basis of comprehensive local applications have not met with immediate success. Few states have included all of the mandated information elements in the local applications we reviewed,

although other sources might be available to the state which provide these data. States should be encouraged, or even required, to shift the content of the local application away from mere statements of assurance to a planning document which describes local goals and plans for meeting them. Such a document could be used not only to inform funding decisions, but as a basis for state monitoring for local compliance in the use of federal funds.

CHAPTER 8

SUMMARY AND CONCLUSIONS

This report has presented the findings of a study conducted by Abt Associates for the National Institute of Education as part of a larger Congressionally mandated study of vocational education. The Abt Associates study was designed to accomplish several purposes:

- to describe state and local implementation of the 1976 Education Amendments and the consequences of federally mandated vocational education policy and practice on state and local vocational education activity;
- to understand the ways in which state and local conditions affect the implementation of federal vocational education policy; and
- to recommend ways in which greater compliance with federal legislative intent can be achieved.

The findings reported here are based on data collected during on-site visits to state education agencies and selected local institutions in 15 states during 1979 and 1980.

In this chapter, we summarize the conclusions presented in each of the previous chapters and, in addition, make recommendations for revising the federal requirements for vocational education which cut across chapter topics.

8.1 GENERAL CONCLUSIONS

The Vocational Education Act as amended by the 1976 Education Amendments is an extremely complex law with multiple, far-reaching goals. As such, it places heavy demands on the state and local agencies responsible for implementing the law--especially in relation to the small contribution the federal dollar makes to the total vocational education enterprise. These demands are particularly difficult given that the requirements for increased reporting, evaluation, and data collection in the 1976 Amendments were accompanied by limitations on the use of VEA funds for administration. Although Congress authorized special funding to assist states in meeting the planning and reporting requirements, the funds were not appropriated until several years into the implementation process and then in limited amounts. In addition, the

increased demands and restrictions on the use of funds for administration came at a time when many states were experiencing severe financial constraints in the face of increasing costs to provide services and growing movements toward tax limitations.

The system of state and local education agencies which the federal legislation is intended to drive is also complex. The structure of the vocational education enterprise is extremely diverse. Moreover, in many states, the state vocational education agency is only loosely associated with the local agencies in the sense that state control over local activities is often limited. Equally important, the system is bottom-heavy in that most important decisions about service delivery--what programs are taught, what curricula are used, and how they are taught--are made by the local education agency.

Taking all these factors into account, it appears that the 1976 Amendments have exerted substantial leverage on the vocational education system in our sample states, at least at the state level where most of the administrative provisions are directed. State vocational education staff spend a considerable portion of their time--some estimate as high as 90 percent--administering the federal law. Federal goals and priorities strongly influence state activities. And overall, many of the federal requirements either were being met at the time of our visit or states were in the process of implementing them. While we cannot speak with the same confidence about the impact at the local level because our knowledge is more limited, it appears that federal requirements are affecting local activities also.

This is not to say that all states in our sample are complying with all provisions to the letter of the law. As we have seen in previous chapters, some provisions of the law cause more difficulty than others, some provisions get more attention than others, and some states are further along in implmenting the law than others. In other cases, the law is being implemented but compliance is not having the consequences Congress anticipated.

These discrepancies between practice and both the letter and the intended consequences of the law appear to stem in large measure from four factors, two of which are associated with characteristics of the federal requirements and two with the characteristics of the state and local vocational education system:

- Certain provisions of the federal requirements are unclear and therefore are variably implemented.
- Some of the major assumptions about the vocational education system on which the law is based--most notably the assumption that the state agency has direct and total control over all vocational education programs in the state--do not fit the system as it actually exists. Consequently, some provisions of the law do not achieve the consequences intended by Congress even when they are implemented as required.
- State and local goals and constraints may conflict with federal requirements. To the extent that the state and local priorities take precedence, the federal law may not be implemented as required.
- State and local agencies differ in the resources and expertise they have available to implement the law. To the extent that these agencies lack funds, staff or technical expertise, they will be unable to carry out the federal requirements, even when they agree with federal goals. Conversely, the presence of resources and expertise, often in the form of existing practices which conform to the requirements of the law, typically increase the extent to which the law is implemented.

Thus, despite current state efforts, there is still room for improvement in bringing state and local practice closer to Congressional intent. The current level of effort together with the reasons for the gaps between intent and practice cited above suggest that the direction for revising the Vocational Education Act to achieve that improvement is not simply to increase the prescriptiveness of the law in the sense of making the requirements more detailed and restrictive. Assuming that Congress wants to retain the multiple goals and broad sweep of the VEA--as opposed to focusing the law on a selected number of goals--the addition of more numerous and narrowly defined provisions will probably have diminishing returns in effecting compliance. Since the law is already prescriptive, since states are already expending considerable effort to comply, and since resources are generally limited, increased specification of detailed requirements can be expected to have little payoff in terms of more uniform adherence to the provisions of the law.

More important, increasing prescription may actually be counterproductive if it increases the emphasis on compliance with the letter of the law to the extent that compliance becomes an end in itself and interferes with other activities. Such a compliance mode may lead state and local agencies to make

overly stringent interpretations of the law. Detailed prescription also implies a single model of service delivery. If the vocational education enterprise were homogenous and actually conformed to a single model, then increasing the prescriptiveness of the federal requirements might be effective. However, given the diversity of the system, a single model does not fit the existing structure and procedures in most states. By forcing diverse states to conform with one model in order to comply with the law, one runs the risk of making the implementation of federal requirements separate from and irrelevant to the actual state planning and management activities. Even worse, efforts to conform with the prescribed model may consume all of a state agency's resources so that it is not able to perform such activities as preparing operational plans for state activities and providing technical assistance and monitoring local education agencies.

An increasing emphasis on prescription in the law would also increase the emphasis on compliance in the new Office of Vocational and Adult Education (OVAE). After the passage of the 1976 Amendments, BOAE devoted an increasing share of its resources to compliance activities at the expense of its leadership and technical assistance activities. One example of the trade-offs that were made as financial constraints became increasingly severe can be found in the priorities set for travel: When the agency's travel budget was reduced, bureau officials decided that the budget would only be used for compliance activities such as conducting the Management Evaluation Reviews for Compliance/Quality; travel to provide technical assistance--formerly a key function of BOAE--was either severely reduced or eliminated entirely. If more prescription is added, OVAE will have to expend even more resources assessing compliance--an investment which does not seem warranted given our analysis that state efforts at compliance will probably yield diminishing results.

In recommending that the prescriptiveness of the Vocational Education Act not be increased, we are not suggesting that states be given federal funds without restrictions. Instead, we are proposing that other strategies for revising the federal requirements will be more effective in bringing state and local practices in vocational education closer to Congressional intent while at the same time not increasing the burden on state and local administrators. Thus, we recommend that four broad types of changes be considered in revising the Vocational Education Act and its administration:

- Clarify the law, regulations, and OVAE administrative policies;
- Modify federal requirements to better match the system in which they operate;
- Increase the flexibility of the federal requirements to accomodate the diversity in the vocational education system; and
- Shift the emphasis of administration at the federal level from compliance to management, technical assistance and leadership.

Clarifying and, where possible, simplifying the law, regulations, and policies is important first to ease the burden of administering the law and, second and more critically, to enable vocational education administrators to know what is required in order to comply with the law. When the administrators of a law are confused about what they are supposed to do, the implementation which follows will inevitably be variable at best and very probably will not meet Congressional intent. The most notable example of an unclear set of provisions in the 1976 Amendments and the accompanying regulations are the requirements for distributing federal funds among eligible recipients. Unfortunately, the policy memoranda issued by BOAE are also confusing, so that many states still have no clear sense of what qualifies as an acceptable funding formula.

Modifying the law to match the system in which it is operating is important not only in improving compliance, but in incresing the congruence between compliance with the law and the realization of federal intent: if the law is based on incorrect assumptions about how the vocational education enterprise operates, as seems to have been the case in several aspects of the 1976 Amendments, then the compliance will most probably not have the desired consequences. The prime example of the need to modify assumptions is acknowledging that state vocational education agencies do not have direct control over all vocational education programs in the state. As we have said repeatedly throughout the report, the system is loosely coupled and bottom-heavy. Major program decisions are usually made by autonomous local districts, not the state agency. Therefore, the notion of a master plan developed by the state to guide vocational education in every program in every school is unrealistic. Requirements for a state plan should better reflect the role the state can play and should emphasize its role as manager and leader. A more detailed example of assumptions not matching reality can be found in the administrative

policies which implement the Amendments. Current sampling policies for evaluations of planning and operational processes are based on the assumption that the goal of program reviews is to describe a representative sample of programs. In fact, however, since the purpose of program reviews is to improve programs in individual districts, they may be more appropriately targeted to districts in need of assistance.

Increasing the flexibility of the federal requirements is another strategy for accomodating the diversity among states. Increased flexibility could be accomplished by actually incorporating it into the law. For example, the 1979 Technical Amendments eased the requirements on the 50-50 match for the handicapped and disadvantaged set-asides. Or it could be done administratively. OVAE's role in maintaining the flexibility intended by Congress is critical. In the past, BOAE has taken a somewhat restrictive view of its oversight functions. In issuing guidelines for administering the waiver on the set-aside match, for example, the BOAE policies appear to be so restrictive and onerous that we wonder whether states will take advantage of the waiver. As another example, the composition of the 107 Committee as specified in the regulations is much less flexible than was originally allowed by the law.

Providing for flexibility should not be viewed as a means of compromising federal intent, but instead may actually serve to bring state and local practices closer to federal intent by accomodating their constraints and characteristics. To again turn to the example of the 50-50 match for the handicapped and disadvantaged set-asides, the match was intended to ensure that federal dollars served as a catalyst to and supplemented rather than supplanted state and local efforts to serve special needs populations. This intent was not being met in some state and local agencies because being unable to generate the required match, the states were returning money unspent to the federal treasury. Future legislation should seek to avoid disincentives of this kind by increasing the flexibility in certain areas. At the same time, federal regulations should establish appropriate rules and procedures to govern the flexibility.

Shifting the emphasis of administration away from compliance toward leadership and technical assistance will require a shift in the orientation of OVAE. Some measures of compliance will still be needed as a basis for accountability. But, rather than focusing primarily on obtaining evidence of

compliance with the letter of the law, OVAE should provide more guidance in how to go about implementing the parts of the law with which states are having difficulty. OVAE should not only issue policy guidelines which spell out what is allowed and what is prohibited, but should also hold workshops and provide materials to share ideas and assist states in approaching issues constructively and with the lastest possible practices. An increased exchange of ideas and materials among sex equity coordinators, for example, would have been especially useful as the coordinators were beginning their new responsibilities after the passage of the 1976 Amendments. As it was, there have been some outstanding sex equity materials developed which have not been widely disseminated and many coordinators were left virtually on their own to operationally define their mandated functions.

These general recommendations about the type of changes needed in revising the Vocational Education Act underlie our more specific recommendations for legislative and administrative changes under the two broad themes of the legislation and under the six chapter topics in this report.

8.2 PROGRAM IMPROVEMENT

The 1976 Amendments contain a cluster of provisions for planning, evaluation, data reporting, and coordination which are intended to improve the quality of vocational education programs and their relevance to labor market needs. In including these provisions, Congress was responding to GAO findings that vocational education programs were frequently duplicative, out-of-date, and irrelevant to current and future labor market needs. These problems were assumed to stem from the fact that:

- state plans were no more than compliance documents;
- the state planning process did not include all parties needed to develop an integrated, unduplicated system of vocational education and manpower training;
- evaluations of local programs were unsystematic; and
- data needed for planning were unavailable or unused.

In designing the provisions intended to remedy these problems and thus improve vocational education programs, Congress appears to have made two basic assumptions about the way in which the vocational education system should operate:

- the state vocational education agency has the ability to plan for and administer all vocational education programs in the state; and
- decisions about courses to be offered could be made solely on the basis of formal data about, for example, the quality of programs, program enrollments, and placement rates and labor market demand.

In fact, as we have seen, the vocational education system operates quite differently. Major decisions about vocational program offerings are made at the local level. In most states, local autonomy is highly valued by local education agencies and is respected by the state vocational education agency. Consequently, in most states in our sample, the state plan does not determine what vocational courses are offered where. The planning documents are prepared to comply with federal requirements, but they do not generally drive local action. In fact, state administrators argue, the state plans do not even drive the distribution of VEA funds to a very great extent because other VEA regulations take away much of the states' discretion in spending the funds. State agencies can, and do, influence local activities in vocational education, but that influence is often through persuasion and assistance rather than direct administrative control, and the state plan is not the major vehicle for conveying that influence.

Morecver, systematic, formal data on enrollments, evaluation results, and labor market estimates are generally collected, reported, and in many cases are taken into account in making decisions aboout vocational programs, but are not the sole basis for decision making at either the state or local level. At the state level, the data are reported in the state plans but their use in planning specific programs is limited by the state role in local planning. At the local level, the federally mandated data are only one factor among many in making decisions. Frequently, formal labor market data generated by the Bureau of Labor Statistics, for example, are secondary to local employer surveys or advice from local advisory councils or craft committees. Also, despite the federal emphasis on the relevance of vocational education programs to documented labor market needs, the schools offering the programs have multiple goals and constraints so that non-labor market considerations such as student interest, the presence of tenured teachers, and the difficulty of discarding expensive equipment from a discontinued course also continue to influence decisions about program offerings. The limited use of formal data

in decision making results not only from the character of the educational system and the decision-making process, but also from the limitations of the data themselves, particularly labor market data: The state-of-the-art of projecting labor market needs for small areas--such as those served by individual school districts--is not well-developed, and vocational educators do not place a great deal of faith in the data available.

This view of how the system operates, together with other findings about difficulties in implementing specific provisions of the planning, evaluation, data reporting, and CETA coordination requirements, suggest the need for certain changes in the Vocational Education Act and in the regulations and policies which implement it.

Perhaps the most substantial change we recommend in the planning provisions is in the focus of the state plans. In order to bring the state plans closer to the original Congressional intent of serving as a blueprint for action and to reduce the burden on the states of reporting detailed data which they do not always find useful, we recommend that:

- The five-year (or three-year) and annual plan should serve as an operational plan for the activities of the state agencies responsible for administering vocational education, rather than as a master plan of all vocational programs in the state.
- These plans could parallel the model of Title I of the Elementary and Secondary Education Act which emphasizes the leadership and management role of the state education agency. The total plans would also be similar to the sex equity plans which currently appear in many state plans.
- In describing their planned activities, the state agencies would be required to describe their objectives and strategies for addressing federal priorities such as using labor market data or assisting local agencies in serving special needs populations.
- The state plans would continue to serve as contracts regarding the use of federal funds.

We also recommend that OVAE provide technical assistance to state agencies to help them strengthen their management and leadership role, particularly in conveying federal priorities to local education agencies. Thus, the technical assistance should address such issues as aiding local agencies to produce better long-range plans, integrating more formal labor market information into planning, and initiating new programs to meet emerging labor market needs.

We recommend that other planning requirements be retained, with certain alterations:

- The membership of the 107 Committee should be allowed to vary to fit the structure of the state in which it is operating, as originally outlined by Congress.
- If Congress is not satisfied with the variation among SOICCs which results from the current practice in many sample states of emphasizing only one of the two functions specified in the law--serving as a coordinating body for joint planning or developing an occupational information system--it should clarify which function is more important.
- Federal requirements should continue to emphasize the use of formal labor market data but with the recognition that the state-of-the-art of supply and demand data is limited and that local assessments of current and future labor needs can appropriately supplement formal data.

In terms of state board evaluations, we believe that the legislative requirements in the 1976 Amendments should be retained intact in the new legislation. The current legislation properly emphasizes program effectiveness and the use of student employment factors as a measure of success. At the same time, the legislation is broad enough that states can add other measures of program effectiveness to offset the narrow focus on student placement and can also measure program quality. The very fact that program reviews are considered so important suggests that states should be encouraged to continue them.

We recommend, however, that attention be given to the administrative of the law by OVAE to ensure that the burden imposed by the evaluation requirements does not become overwhelming:

- The regulations should be clarified to distinguish between those evaluation elements which are suggested and those which are required.
- OVAE should be encouraged to continue to allow sampling in all evaluation areas, but should alter its sampling policies for planning and operational processes. Since the goal of program reviews is program improvement in individual districts, OVAE should allow the selection procedures to target reviews to the districts most in need of improvement, rather than seeking a representative sample of programs which might miss those districts.

- OVAE should be encouraged to continue the policies which allow states flexibility in selecting measures of student achievement, and planning and operational processes.
- OVAE should also provide technical assistance to states in developing measures to assess the results of additional services to special needs populations.

In contrast with the recommendation that the state board evaluation requirements being retained essentially intact, we believe that the VEDS requirements should seriously be reexamined. It is not clear that the collection of detailed, standardized data on vocational education annually through local reporting is necessary for overall decision making or program improvement at the level. The key issue in redesigning VEDS is to distinguish between data needed for federal policy making and those needed for state and local decision making. We recommend that:

- Data required by the federal government for long-range planning and for reauthorization, such as detailed breakdowns of enrollment and placement data by type of student served, should be gathered only once every three or five years and then on a limited sample, rather than universe of programs and students.
- Data used by state and local officials for management and compliance, on the other hand, should be reported annually, but perhaps should not require such detailed breakdowns. The information should focus, for example, on federal funds expended, the state and local match provided, and number of students served under each subpart by eligible recipient. While some description of expenditure, enrollment, and placement by program type and student type would be desirable, it should be done in much broader categories than presently required.

In relation to the requirements for the state advisory councils, the law currently contains potentially conflicting mandates to assist in state planning and serve as a watchdog over the state agencies' performance. Since the majority of councils in our sample seem to fill one role or the other but not both, we recommend that Congress determine which role it feels to be most important. If Congress retains the evaluation requirements, which we feel are appropriate, we recommend that the provisions be clarified to:

- Allow SACVEs to select one or two issues to examine systematicaly and independently each year, rather than requiring them to evaluate all vocational programs, services, and activities in the state;

- Provide guidelines on the state boards' responsibilities in providing data to the SACVEs.

We also recommend that NACVE and OVAE provide increased technical assistance to the state advisory councils to:

- Assist the SACVEs in designing independent evaluations, or research studies;
- Develop more formal procedures to monitor state board evaluations.

In order to strengthen the coordination provision of VEA and CETA, we recommend that:

- Mandated joint committees should be continued, but states be allowed to combine committees if they deem it appropriate to reducing the duplication of effort.
- For 1 percent and 4 percent funds, if Congress is not satisfied with the current broad range of uses to which these monies are put, the allowable uses should be narrowed.
- For 6 percent monies, if increasing state-level coordination is a major purpose of the set-aside, then the set-aside should be retained as currently structured; i.e., channeled through the state board of education. If the aim of the 6 percent grant, however, is to make certain that existing deliverers of vocational education services are used and to avoid the establishment of duplicate agencies, the funds should be given directly to Prime Sponsors earmarked for use for vocational education.

8.3 EQUITY

The 1976 Amendments include a variety of provisions intended to provide equity in vocational education for a number of special target populations. The emphasis on special populations began with a broad mandate in the 1963 Vocational Education Act that vocational education respond to the special needs of students who have academic, economic, or other handicaps which prevent them from succeeding in regular programs of vocational education. In 1968, Congress felt that the broad mandate which simply emphasized that special services were needed for these groups was not having the impact it sought. It therefore amended the law to separate handicapped and disadvantaged students, to specify that a certain proportion of each state's VEA grant be set aside to serve each group and to authorize special programs for the disadvantaged under a separate subpart. By 1976, Congress was still dissatisfied with

the size of the expenditures for these populations, especially with the state and local funds contributed. The 1976 Amendments therefore maintained the 10 percent set-aside for handicapped students, maintained the separate subpart for special programs for the disadvantaged, and increased the set-aside for disadvantaged students from 15 to 20 percent. The Amendments also specified for the first time that a portion of the disadvantaged set-aside be reserved for limited English-proficient students in proportion to their incidence in a state's population between the ages of 15 and 24.

The 1976 Amendments also contain for the first time requirements to promote equity between the sexes in vocational education. Although the law is directed at access for both men and women, the concern for sex equity grew out of findings that women in vocational education tended to be clustered in certain occupational areas and virtually absent from others. Moreover, the areas in which women were enrolled typically led to lower-paying jobs and careers than those areas dominated by men. Congress sought to remedy this inequity by including mechanisms to promote access of women--and men--to occupations not traditionally entered by people of their gender.

In giving priority to sex equity, Congress relied on a different approach than it used in giving priority to the handicapped, disadvantaged, and limited English-speaking. Rather than requiring that a substantial proportion of each state's grant be spent on sex equity, Congress mandated that each state hire full-time personnel to address sex equity and specified nine functions those personnel were to carry out (a tenth function was added in the regulations). Certain funding provisions were also included--states are required to spend $50,000 of their basic grant to support the sex equity personnel and states are allowed, but not required, to use Subpart 2 and 3 funds to support sex equity activities--but these provisions are less prominent than the full-time personnel and certainly weaker than the set-asides for the handicapped and disadvantaged.

Our investigation of these two approaches to giving priority to special target populations--earmarking funds and mandating state staff--suggests that each approach has its own strengths and attendant weaknesses. Earmarking funds ensures (or at least increases the probability of) a certain level of service for handicapped and disadvantaged students at the local level; simply

earmarking funds, however, does not guarantee that the state agency will provide leadership and assistance--aside from distributing federal funds--to serving these groups. Conversely, mandating state staff ensures a certain level of attention in the state agency, but does not necessarily result in activity at the local level. Given these trade-offs, one might argue that the strongest way to give priority to any special group would be to mandate both mechanisms. Despite the strength of the combined approach, we would not recommend that it be adopted in the Vocational Education Act if Congress wants to maintain all of the current program improvement goals and requirements of the law also. Mandating both state staff and a significant level of expenditure for the handicapped, disadvantaged, limited English-speaking, and men and women in nontraditional occupations would be too burdensome and too restrictive on the states.

Instead, we recommend much more modest changes in the same direction. Thus, for the special needs populations, in addition to continuing the set-asides, we recommend that the state agency be required to document in the state plan the activities which state staff are going to perform in the areas of training and technical assistance, monitoring of local activities, and coordination with other state agencies serving the same populations to promote vocational education for handicapped, disadvantaged, and limited English-speaking students. Such a plan would be comparable to the current plan required for sex equity, and is consistent with the earlier recommendation of reorienting the state plan to be a master plan of state agency activities. For sex equity, in addition to maintaining the mandate for full-time personnel with specified functions, we recommend that Congress impose a separate requirement, similar to that now in place for displaced homemakers, to spend whatever funds are deemed necessary to assess and meet the needs of women and men in nontraditional occupations.

In addition, in maintaining the set-asides for handicapped and disadvantaged (including the limited English-speaking students), we recommend that the excess cost and matching requirements be continued on the assumption that the problems currently encountered stem primarily from the states' lack of experience with these reqirements. We would, however, recommend limited changes in the requirements and their administration:

- The definitions of excess costs should be clarified.
- The potential disincentive to mainstreaming should be removed by eliminating the present policy of allowing federal reimbursement to be applied against the full cost of separate programs.
- The revised policy which eases the requirement for a 50-50 match should be maintained and its administration should be flexible enough to really ease the burden on state agencies.
- OVAE should be required to provide technical assistance to state agencies, and state agencies should provide assistance to local institutions to assist them to define, document, generate creative program ideas for excess costs, and to locate matches.
- Congress should monitor the set-aside procedures to determine whether states are mastering the excess cost and matching requirements or whether requirements continue to serve as disincentives to the use of federal funds.

To improve the actual provision of services to special needs populations, we recommend that:

- The use of the P.L. 94-142 process of identifying handicapped students and assessing their needs for vocational education should be continued, but the Handicapped Act, as amended, should be revised to specify the involvement of vocational educators in the IEP process when the education plan potentially includes vocational education.
- In the absence of an existing, common procedure for identifying and assessing the needs of disadvantaged students, individual districts should be allowed to define their procedures. Those procedures should be described in the local plan for vocational education and should be subject to approval by the state vocational education agency. Data gathered for ESEA Title I should be deemed applicable for identifying disadvantaged students.
- If the emphasis on limited English-speaking is continued, additional federal assistance should be provided in developing strategies for identifying and serving this population in vocational education.

By and large, the provisions governing sex equity are clear and consistent. As stated above, we recommend retaining those governing full-time sex equity personnel and their prescribed functions. We would, however, recommend some limited changes:

- Consideration should be given to increasing the set-aside amount to adjust for the effects of inflation.

- The statute and/or regulations governing function f--monitoring laws prohibiting sex discrimination in employer practices--should be clarified.
- Consideration should be given to supplementing the language of the legislation to include the notion of "expanding sex role expectations" or "expanding career options."
- The statute and/or regulations should make explicit the relationship and the responsibilities of the sex equity coordinator to the administration of the OCR Guidelines.

With respect to the use of discretionary funds, we recommend that:

- Under Subpart 2, the distinction between the target populations served by displaced homemaker programs and other support services for women entering nontraditional programs should be clarified.
- Under Subpart 3, consideration should be given to strengthening the language in regard to establishing incentives for developing programs at the local level to eliminate sex bias and sex stereotyping.

In regard to the national advisory council (NACVE), we encourage the continuation of their efforts to provide leadership in the area of sex equity. In relation to the state advisory councils (SACVEs), we recommend that:

- Consideration should be given to strengthening the language of the statute and/or the regulations concerning the "appropriate representation" of women on the SACVEs.
- Consideration should be given to strengthening the language concerning SACVE responsibility to conduct evaluations of programs for sex equity.

Finally, we encourage further efforts by OVAE to provide leadership and technical assistance in the area of sex equity:

- There should be a team of full-time OVAE-based program specialists who can provide continuity of service to the states.
- In addition to current plans for written dissemination materials, desk audits by the federal program specialist, and MERC/Q reviews, federal funds should be provided to support communication and the dissemination of materials and exemplary practices among coordinators.

8.4 DISTRIBUTION OF FUNDS

The major difficulty with the present legislative provisions for distributing federal VEA funds among eligible recipients is that many requirements are unclear or potentially in conflict with others. Although BOAE attempted to resolve these problems through regulations and policy memoranda, confusion remains. Congress needs at a minimum to clarify both its intentions regarding the use of VEA funds and the language of the Act governing funds distribution by state agencies in order to provide clear instructions to the states.

More specifically, to increase the flexibility available to the states in distributing VEA funds according to federal priorities, we recommend that:

- The mandated 80/20 split between Subparts 2 and 3 should be changed to a requirement that states spend at least 20 percent of its basic grant for the Subpart 3 purposes of program improvement and support services.
- The priority criteria for distributing funds among eligible recipients should be clarified, either through the law or administrative policy, to provide clear standards for an acceptable formula and workable indicators.
- States should be allowed to use funding pools to target funds according to state priorities, but federal requirements should specify the dimensions on which pools are acceptable so that their use does not result in distributions contrary to federal priorities.

To support the emphasis on new programs, we recommend that a clear, operational definition of new programs should be developed; the definition should include the updating and improvement of existing programs. Moreover, if Congress finds unacceptable the current practice in many sample states of giving priority to either new programs or needy districts--but usually not to both--it should consider specifying which priority it thinks should be emphasized or at least establishing a procedure for dividing funds between them. One possible strategy is the creation of a pool of funds for new programs. If such a pool is required, its size can be determined either by federal requirement; i.e., the creation of another set-aside, or at the discretion of each state. We do not recommend a set-aside with a specified level of funding because it would be overly restrictive and would not accomodate differences among states in their need for and ability to support new programs. If Congress does decide to mandate a specific set-aside, we recommend that other restrictions on the use of funds, such as the 80/20 split, be eliminated or

relaxed at the same time. If Congress chooses to mandate a new program pool, but leave the level of funding unspecified, or to simply allow states to create pools at their choice, we recommend that states be required to explain and justify in the state plan their criteria and goals in using these funds.

To improve the content of local applications, if they are to be used as the basis for decision making about local programs, we recommend that the content be shifted from statements of assurance to a local plan which describes local goals and plans for meeting them.

APPENDIX A

METHODOLOGY

1.0 RESEARCH METHODOLOGY

Our approach to data collection was based on the use of a case survey methodology which combines case study and survey methodology. This approach allows specification of the types of information needed in greater detail than a traditional case study approach. In addition, the case survey approach allows more integration of the qualitative data collected and the eventual use of traditional quantitative techniques in the analysis of the data.

The process for the handling of the qualitative data was structured to allow comparisons across and generalizations from the cases through a standardized analysis/report outline and an extensive review process. The standardized analysis/report outline specified the research questions and issues, the data to be used, and the decision rules that guided judgments for each set of questions and issues. The review process was designed, through its iterative nature, to substantiate interpretations and conclusions, assure completeness of the presentation, and general adherence to a standardized format.

2.0 SAMPLING PLAN

Our sampling plan involved several stages. First, in conjunction with NIE Vocational Education Study staff, we selected 15 states in which to conduct state-level interviews. Then, we selected ten of these states in which to conduct extensive interviews at the local level. Within these ten states, we selected local vocational agencies in which to examine local compliance and evaluation issues. In all of these jurisdictions, we selected one secondary school for in-depth study and in each of these ten states, we also selected for examination one or more postsecondary school serving the jurisdiction, and we explored the coordination between vocational education and CETA. Finally, at each educational level, we selected education and training policy makers, planners, administrators, and other personnel, as well as community representatives, to serve as respondents in the study.

2.1 Selection of States

Five of the 15 states were examined at the state level only; ten states were examined at both state and local levels. All 15 states were investigated with respect to all major components of the study.

In selecting the 15 states, we attempted to ensure that:

- they were geographically diverse;
- they included a significant proportion of the students in the nation, both overall and by minority group; and
- they were representative on a number of other dimensions which might be expected to influence compliance.

In order to accomplish these purposes, the following criteria were used:

1. Region. The states were selected on the basis of the four census regions: Northeast, North Central, South, and West. To achieve geographical representation, at least three states in each region were selected.

2. Percent of Student Population. To ensure that a representative sample of the potential vocational education student population was included, we selected the five states with the largest population of young adults aged 16-25. These states represent 35.6 percent of the national population aged 16-25. With the addition of the other states in the sample, 50.7 percent of this population is represented.

3. Governance. To ensure adequate representation of various governance patterns, states were selected on the basis of their governance structure for vocational education. (Figure A.1 categorizes each sample state by its governance structure type.)

The law requires that a Sole State Agency be appointed for vocational education. The location of that agency within the education delivery system may affect the ability of the state to respond to the various requirements governing vocational education, particularly those dealing with such issues as planning and distribution of funds by educational level. Gentry identified four different governance patterns in his study of vocational education:

- one agency for all levels of education;
- an agency for elementary and secondary schools, including

Figure A.1

STATE SAMPLE FOR CASE STUDIES

Governance of Vocational Education	Region			
	Northeast	North Central	South	West
State Board of Education for all levels of education (6 states in universe)	New York Pennsylvania		Florida	
An agency for elementary and secondary, including vocational education, and an agency for higher education (31 states in universe)	New Hampshire	Illinois	Alabama Texas	California Oregon
An agency for elementary and secondary, an agency for vocational education and an agency for higher education (8 states in universe)		Indiana Wisconsin	Kentucky Oklahoma	Colorado
An agency for elementary and secondary, including vocational education, and individual governing boards for institutions of higher education (3 states in universe)				New Mexico
Percent of national population aged 16-25	15.2%	10.3%	12.8%	12.4%

vocational education, and a state coordinating or governing agency for higher education;

- an agency for elementary and secondary schools, an agency for vocational education, and a state coordinating or governing agency for higher education; and
- an agency for elementary and secondary schools including vocational education and governing boards for individual institutions of higher education with no statewide governing agency.*

4. Relative Percent of Central City, Other Metropolitan, and Non-Metropolitan Areas. Administrative and organizational models of vocational education depend very much on the area in which they are offered. Area vocational schools serving one small town and several rural counties are likely to be found in a non-metropolitan area, comprehensive high schools are generally found in central cities and shared-time arrangements are common in suburban (other metropolitan) areas. What is more, the population of the country is distributed among three relatively equal groups:

- Central city - 31.4%
- Other metropolitan - 37.2%
- Non-metropolitan - 31.4%

Therefore, the states sampled have been chosen to reflect this diversity.

5. Percent Minority. By including the nation's five largest states, the sample includes the following percentages of the national population of the four major minority groups:

- Black - 27.2%
- American Indian - 13.6%
- Asian - 46.7%
- Hispanic - 69.5%

Additional representation was achieved through inclusion of other states. We have also purposefully selected states to be representative of specific subsets of the minority groups listed above.

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*Gentry, Don K., "Federal and State Governance of Vocational Education: Its Relation to Compliance with Federal Rules and Regulations," 1978.

6. Percent Women in Non-Traditional Vocational Training. By analyzing the enrollment data for each state by sex and comparing the percentage of women in each state to the percentage of women nationally, those states where women have been moving into non-traditional programs can be identified. Some states have made a greater effort than others to move women into non-traditional vocational programs. Some probably have made a greater effort to overcome traditional sex stereotyping in vocational education. However, it is important to note that major gains have been made in vocational agriculture--not in trade and industry (T&I), where the major efforts have been made to expand women's participation. We have selected states on the basis of female enrollment in T&I

7. Percent Postsecondary. The 1976 Amendments demand that 15 percent of federal funds be expended at the postsecondary level. Four states in our sample have 20 percent or more of their vocational education students at the postsecondary level: California, Colorado, Oregon, and Wisconsin. Four states in our sample have relatively low proportions of postsecondary students: New Hampshire, Illinois, Indiana, and Pennsylvania.

Table 1 presents the values for the 15 states selected for the sample on each of these criteria.

2.2 Selection of Districts and Schools

The selection of districts and schools was performed through a multistage sampling design. In all, 16 school districts were selected for study. Within each of the 16 school districts, one secondary vocational school was selected for study. In 12 of these school districts, one postsecondary school serving the district was also selected. In addition, 10 CETA prime sponsors were selected in which CETA/vocational education coordination was studied. The goal of the sampling strategy within states was to maximize the representativeness of the total sample on four dimensions:

- population characteristics*

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*These classifications correspond to standard census definitions taken from the Bureau of Labor Statistics, Current Population Survey, 1976.

Table A.1

SUMMARY OF SAMPLING CONSIDERATIONS

(1)	(2)	(3)	(4)			(5)				(6)	(7)
REGION/STATES	% U.S. POPULATION AGED 16-25 IN STATE	STATE GOVERNANCE STRUCTURE	% CENTRAL CITY, OTHER METRO, NON-METRO			% U.S. POPULATION MINORITY IN STATE				% WOMEN IN NONTRADITIONAL VOCATIONAL TRAINING T. & I. (H, L, M)	% VOCATIONAL EDUCATION STUDENTS IN POST-SECONDARY SCHOOLS
			CC	OM	NM	BLACK	INDIAN	ASIAN	HISP.		
Northeast											
New Hampshire	0.4	B	19.5	7.9	72.6	0.1	0.0	0.0	0.2	1.5 (L)	4.6
New York	9.0*	A	51.1	35.4	13.5	9.6	2.2	7.9	9.4	3.4 (L)	13.9
Pennsylvania	5.8*	A	28.6	50.8	20.6	4.5	0.1	1.5	2.2	4.6 (M)	10.3
North Central											
Illinois	5.5*	B	36.7	43.4	19.9	6.3	1.4	2.7	3.9	4.4 (M)	6.0
Indiana	2.6	C	33.8	28.1	38.1	1.6	0.6	1.1	0.7	6.3 (M)	6.3
Wisconsin	2.2	C	30.5	27.1	42.4	0.3	0.4	0.4	0.2	10.5 (H)	22.2
South											
Kentucky	1.6	C	17.1	23.0	60.0	0.9	0.1	0.1	0.7	3.2 (L)	9.6
Texas	5.5*	B	48.2	25.4	26.5	0.6	0.1	1.4	20.9	4.1 (M)	10.2
Alabama	1.1	B	25.5	26.7	47.7	4.0	0.4	0.2	0.2	3.3 (L)	10.2
Florida	3.3	A	28.7	38.9	31.4	4.3	0.8	0.9	6.0	5.7 (M)	9.4
Oklahoma	1.3	C	29.8	20.3	49.9	0.8	12.3	0.2	0.4	4.4 (M)	7.6
West											
California	9.8*	B	36.3	56.4	7.3	6.2	9.8	33.2	33.1	5.9 (M)	27.1
New Mexico	0.5	D	24.0	7.1	68.9	0.1	8.7	0.1	4.4	7.1 (M)	10.9
Oregon	1.0	B	25.2	36.0	38.8	0.1	0.3	2.9	0.4	5.3 (M)	20.0
Colorado	1.1	C	33.8	37.8	28.4	0.2	1.1	0.6	2.5	4.1 (M)	21.1
PERCENTAGE IN SAMPLE	50.7					39.6	38.3	53.2	85.2	50.7	
U.S. Average										5.9 (M)	12.3

*Indicates five largest states.

Source:

(1) U.S. Census groupings
(2) Grant, W. Vance, and George Lind, Digest of Educational Statistics 1976 (Washington, D.C.: National Center for Educational Statistics, U.S. Office of Education).
(3) Gentry, Don K., "Federal and State Governance of Vocational Education: Its Relation to Compliance with Federal Rules and Regulations," 1978.
(4) Bureau of Labor Statistics, Population Survey, 1976.
(5) U.S. Bureau of Census, Characteristics of the Population, 1970, Vol. I.
(6) Bureau of Occupational and Adult Education Annual Report, 1976.
(7) Bureau of Occupational and Adult Education Annual Report, 1976.

— central city

— other metropolitan

— non-metropolitan

- type of secondary school
  - — vocational center
  - — vocational high school
  - — comprehensive high school
  - — designated area vocational high school
- type of postsecondary school
  - — community college
  - — technical institute
- CETA model
  - — balance of state prime sponsor
  - — consortium prime sponsor
  - — single unit prime sponsor

2.3 Selection of Respondents

Respondents were selected from state and local agencies responsible for education and training, from schools, and from advisory councils. In general, persons directly connected with the vocational education system were interviewed.

While we tentatively identified an extensive list of possible respondents at the various levels of the system before going into the field, we must emphasize that the a priori listing was neither fixed nor exhaustive. We expected the actual number and categories of persons interviewed to vary, depending on the organizational structure of the state or local jurisdiction involved and the persons who actually affect the decision-making process.

Respondents at the State Level. At the state level, we sampled respondents who were directly involved in setting vocational education policy, administering vocational education, assuring non-discrimination in vocational education programs, and evaluating program effectiveness. Respondents included the following types or categories of officials:

- chairperson of the appointed state board responsible for vocational education;

- chairperson of the state board of education and/or higher education, if different from the board responsible for vocational education;
- chief state school officer (commissioner of education);
- commissioner of higher education and/or director of the community college system (if different from above);
- state director of vocational education;
- state director of postsecondary vocational education (if different from above);
- sex equity coordinator;
- vocational education staff at secondary and postsecondary level (if appropriate) responsible for:
  - planning
  - funds distribution
  - vocational education data systems
  - coordination with CETA
  - evaluation
  - adult education
- one or more of these staff members, where appropriate:
  - director of the division or office concerned with Title IX
  - director of the division or office concerned with the handicapped
  - director of the division or office concerned with bilingual education
  - director of the division or office concerned with minority students

We also interviewed numerous persons involved in the state planning process, including several members of the State Advisory Council on Vocational Education (SACVE). These included:

- representatives of the following agencies and individuals who are required to participate in the planning process:
  - the agency responsible for vocational education at the secondary level;
  - the agency responsible for vocational education at the postsecondary level, if different;
  - vocational education teachers
- SACVE members, including:
  - the chairperson

— SACVE member who participates in the state planning process, if different from the chairperson

— representatives of or persons concerned with:

1. management or business
2. industrial and economic development
3. vocational education teachers
4. school systems with large concentrations of poor or disadvantaged students or persons with special interest in such students
5. sex discrimination and sex role stereotyping
6. the problems of the handicapped

- a representative of the State Occupational Information Coordinating Committee (SOICC)

Finally, in order to explore the topic of coordination between CETA and vocational education, we interviewed the following persons at the state level:

- SACVE and State Employment and Training Council (SETC) staff or members fulfilling reciprocal membership mandates (if different from above)
- Governor's or other state staff responsible for CETA/ vocational education coordination
- Balance of State director/planner (where appropriate)

Respondents at the Local Level. At the district level, both secondary and postsecondary, we interviewed respondents such as:

- members of the secondary school board and community college board;
- superintendent of schools;
- administrator of community college;
- director of vocational education;
- administrator of the vocational school;
- one or more staff members responsible for:
  - planning/preparation of the local application
  - evaluation/vocational education data systems
  - CETA coordination
  - adult education
  - Title IX
  - the handicapped

— bilingual education

— disadvantaged

— minority students

- one or more members of the Local Advisory Council for Vocational Education (LACVE)

In order to assess CETA/vocational education coordination, we interviewed the director and/or planner of at least one CETA prime sponsor serving the jurisdiction.

3.0 SITE VISIT PROCEDURES

Instrumentation for this effort was more flexible than the usual survey format and was designed to be comprehensive both in terms of substance and data collection procedures. The data collection process was multi-staged, with instrumentation designed to guide case study teams through each stage. Stage I of the process consisted of staff preparation for the site visit. Stage II consisted of the site visit itself, and includes instrumentation to guide both the on-site interviews and the write-up of field notes. Stage III consisted of post-visit debriefings with core project staff in Cambridge, and reporting.

Stage I: Preparation for the Site Visit. Procedurally, preparation for the site visit was straightforward and simple. It was guided by the topic agendas described in the next section. All team members were required to be thoroughly familiar with applicable federal laws and regulations and to be knowledgeable about the specific features of the state they are to visit. By reading available materials from the state and through discussions among team members, each team used the topic agendas to generate site-specific interview topics for each prospective interviewee. Then, prior to the visit, each team specified the precise issues and questions to be explored in each site, and identified prospective interviewees.

Stage II: The Site Visit, Interview, and Write-Up of Field Notes. The conduct of interviews was usually based on the topic agendas. The actual questions to be asked were both site- and interviewee-specific. In the course of pre-visit planning, the site visit team pre-specified for each interviewee the topics to be discussed and determined the information already available. Thus, the interviewer had readily available notes to cue discussion.

Interviewers were required to take careful notes during all interviews and to write up field notes daily. In addition, team members conducted mini-debriefing sessions among themselves each evening while in the field and used such discussions to explore the information obtained to identify future avenues to be probed and to refine the objectives for the remainder of the site visit.

Stage III: Debriefing and Reporting. Formal debriefing sessions occurred following the site visits. The first session focused on refining issues, study questions, and interview procedures. Procedures and instrumentation were thoroughly discussed, along with findings from each site.

Subsequent debriefings focused on findings. Each team presented a site report to the core project staff. Following the debriefing for each site, the team prepared a standardized written report. These reports yielded extensive, in-depth, and standardized information for each site which then formed the basis for much of the subsequent within-site and cross-site analysis.

4.0 INSTRUMENTS

The chief method of data collection in the case studies were interviews. Considerable use was made of other data sources such as the state plans for vocational education. Consistent with the exploratory and descriptive nature of this study and with the case survey methodology discussed in the previous section, the interviews conducted for this study were informal and flexible. In following this approach, the study did not rely on precise interview schedules but, instead, relied on two types of instruments--topic agendas and reporting formats.

Topic Agendas: The topic agendas specified the issues to be covered in the interviews. The case study teams were accountable for obtaining adequate information on each topic, but because the respondents and specific information required from each interview varied, team members determined the specific questions to be asked and wording to be used. The case study teams also identified the specific people to be interviewed in each site within the groups of respondents described in Section 2.3.

The topic agendas by themselves are not adequate guides for the site visits. The case study teams were required to generate much more detailed questions for the actual interviews. Key elements in successfully using the

topic agendas were substantial team training and careful preparation for the site visit. All case study teams were required to become fully acquainted with all the issues in the study through reading and through discussion with senior project staff. In addition, they studied all written documents on the vocational education system in their site so that they were knowledgeable about the system before they made the field visit and, therefore, were able to ask meaningful questions.

Reporting Formats: Interviewers were required to take careful notes and to write up field notes daily using a standard format. The write-up of field notes was especially important in this study, as explained in the previous section, because limited time and resources did not allow for post-visit analysis of raw information and, more important, because the data collection was an iterative process.

APPENDIX B

ANALYSIS OF STATE AND FEDERAL PLANNING AND REPORTING DOCUMENTS

1.0 INTRODUCTION

This appendix presents the results of the analysis of the state reporting documents required by the Vocational Education Amendments (VEA) of 1976. It was the purpose of this analysis to provide objective evidence on the extent to which state vocational education agencies have prepared various documents to comply with provisions of the federal regulations, particularly those having to do with the five major themes addressed in our in-depth examination of the implementation of the 1976 Amendments in 15 states. Originally, the review had been perceived as an ongoing effort that would provide evidence on state compliance with various provisions of the Act. It became apparent early in the study that these documents provide information only about requirements for written evidence of compliance. For example, one can determine from the state plan whether members of the State Plan Committee (107 Committee) met the required number of times and signed statements regarding their opportunity to have input into the plan's development. One cannot tell, from the documents alone, however, whether the input was pro forma or meaningful, as Congress had intended. Similarly, one cannot tell from the data presented in State Plans whether states are distributing federal VEA funds according to the legislative mandates. Thus, the focus of review effort has been modified somewhat from the original goals to somewhat more limited ones.

1.1 Documents Reviewed

The Education Amendments of 1976 require state vocational education agencies to prepare certain documents as a condition for receiving federal assistance under VEA.* The Act also required the Commissioner of Education to review these state reports and to conduct evaluations of state compliance with the law. A total of four state documents were selected by AAI for review:

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*Requirements for the five-year state plan are contained in Section 107 of the Act. Section 108 contains the requirements for Annual Plans and Accountability Reports.

- Five-Year State Plans for Vocational Education (FY 1978 to FY 1982)
- Annual Plans for FY 1979
- Accountability Reports for FY 1978
- 1979 State Advisory Council for Vocational Education Reports

1.2 Purpose and Contents of the State Documents

Five-Year Plans: The Five-Year State Plan for Vocational Education was a requirement new to the 1976 Amendments, although states had three- or five-year plans under the previous Act. Congress saw the Five-Year Plan as a comprehensive, long-range blue print for a state's effort in vocational education. It was to reflect a state's assessment of its need for vocational education, taking into account the population to be served, job markets to be met, regional distribution, and special needs. Also, in this document, states were to set realistic objectives for which they would be held accountable.

These goals, as stated in various Congressional reports, were the basis for the requirements set forth in the Act and the Regulations. The Regulations are quite specific with respect to the process states should follow in developing the state plans and in the actual substance to be included by states. Sections 104.161 to 104.187 of the Regulations specify the development process and the content of the Five-Year Plan.

Annual State Plans: Annual Plans for Vocational Education, according to the Senate Report (pp. 4785-4787) were intended to represent reasonable steps toward meeting these (five-year) goals, and would serve as a yardstick to the state to measure its own successes. They also provided the state with a means of amending the five-year plan in view of more recent data which became available or if a different level of federal or state funding was provided than had been expected.

The Federal Regulations, at 104.222, provide details of the content of the annual plan for years subsequent to FY 1978. (The requirements for the FY 1978 Annual Plan were generally met by the Five-Year State Plan.) Compared with the Five-Year Plan, very few specific requirements were placed on the states. Primarily, these have to do with updating the five-year plan. States must also present a discussion of the results of CETA coordination, providing equal access, and participation of local advisory councils.

Accountability Reports: The Accountability Report was seen as a way of encouraging states to periodically review their progress toward achieving the goals of the State Plan. It served a dual purpose in that BOAE was also to use it to measure a state's progress and to hold it accountable for reaching its own goals.

The Accountability Report has been seen, by both states and BOAE, as unnecessary duplication of the data required by VEDS. Hence, more recent Accountability Reports are not required to provide all the data required in the Regulations at 104.241. However, the FY 1978 reports were held to these requirements, and the Regulations were the basis for our review.

In addition to assessing progress toward goals, states were to provide detailed fiscal and programmatic information, including the results achieved. Reports were also to discuss the progress states had made on evaluating vocational education programs and how the results of these evaluations had been used to improve programs.

The SACVE Report: Each year, the State Advisory Council on Vocational Education (SACVE) is to submit a report to the Commissioner of Education and the National Advisory Council on Vocational Education (NACVE). This report has been prepared since 1968 and should contain specific content, described in Section 104.97 of the Regulations. This report is primarily evaluative in nature and must seek to determine how effective the state has been in using federal funds to achieve the state plan goals. Each SACVE must also make specific recommendations as needed. The most challenging task is, as stated in the Regulations, to identify the "vocational education and employment and training needs of the state" and "assess the extent to which vocational education . . . and other programs . . . represent a consistent, integrated, and coordinated approach to meeting such needs."

1.3 Restrictions on the Analysis

There were two major restrictions to conducting the documents analysis. The first restriction stems from the inherent limitations of document analysis. Documents are often prepared strictly for compliance reasons. As a result, they may bear little relationship to the activities in which states are engaged. That is, persons writing the document may either under- or overstate the activities which are the subject of the report. Also, some documents are

technically better than others, with the mandated information clearly presented. The quality of the document may not accurately reflect the quality of the work actually being done in the states. In this analysis, there was no readily available means of testing the validity of the data nor or correcting mistaken impressions on the part of the reviewer. Given these limits, the analysis was restricted to the most concrete types of information contained in the documents. While this technique did not provide protection from invalid information, it did provide some safeguards by limiting value judgments made by the reviewer.

The second restriction to the documents analysis was the availability of the documents involved. Not all states provided the requested reports, and many documents were forwarded by states which referenced other documents or missing appendices as containing information which, presumably, would have provided evidence of compliance with the Regulations. In these instances, it was decided to simply indicate that it was not possible to accurately determine whether the state had complied with the relevant requirement.

2.0 ANALYSIS OF STATE DOCUMENTS

Tables B.1 through B.10 present the results of reviews of state planning and reporting documents. As may be seen, each of the tables lists the kinds of information required by the Regulations, and indicates whether or not each state supplied the information. In a few cases, it was found that the reviewer could not determine whether the Regulation had been satisfied. The "Cannot Determine" category was used when parts of the state plan were missing or when the reader was referred to another report not on file.

Five-Year Plans: Tables B.1 through B.7 present the results of the analysis of 33 five-year plans. Despite the fact that states prepared the five-year state plan for vocational education before the Regulations were published, the review found a high degree of compliance with the Regulations. Each plan was reviewed for compliance against 37 key requirements, with the result that a majority of states complied with 34 of the 37 items.

A review of the four items which most states had omitted from the state plan indicated that these were requirements new to the state plan in 1977-1978. Among these was providing a description of how the state agency

would avoid duplication of vocational education and manpower training programs. Few State Occupational Information Coordinating Committees (SOICCs) were fully operational at the time the plan was submitted--two out of 33 in our sample--with the result that states generally were unable to draw on this resource in 1977. The other two requirements which most states did not address had to do with presenting breakdowns of projected enrollments and funds allocation by type of institution (e.g., comprehensive high school, area center, community college). Perhaps states needed more time to collect and prepare accurate estimates of enrollments and funds by levels; VEDS was not operational at the time the plan was prepared. It is also possible that the Act did not present this requirement in as much detail as the Regulations, so the states did not know what was expected from them.

Annual Plans: Our review of the contents of the Annual Plan for Vocational Education for 38 states on ten compliance items indicated a high degree of state compliance with the Regulations. Table B.8 shows that three of the four items on which a relatively low proportion of states (27, or 71 percent, or less) contain evidence in the plan are items for which states are required to provide data only when they differ from those presented in the five-year plan. Thus, not providing the information may be an indication that the plan had not changed, not that a state is not in compliance with this item. It is interesting to note that 33 states do report changes in the proposed uses of funds. The fourth item with a relatively low proportion of yes responses--evidence that the 107 Committee held its three required meetings--also shows a high proportion of "cannot determine." This pattern suggests that, again, the responses do not necessarily indicate a failure to comply; the difficulty may simply be one of inadequate reporting.

Accountability Reports: A review of 31 State Accountability Reports on seven criteria mentioned in the Regulations indicates a high degree of compliance with the required contents. As shown in Table B.9, states had little difficulty supplying the mandated information. An exception was that about 40% of the states failed to present more than cursory information on how the state use of federal funds met the set-aside, matching, and maintenance of effort provisions.

State Advisory Council on Vocational Education Reports: SACVE Reports were reviewed for 31 states. This review looked not only at the compliance

with Section 104.99 of the Regulations, but also sought to determine how SACVEs interpreted their rather broad responsibilities. Specific review criteria were selected for the four mandated items. These are presented in Table B.10. It may be seen that most SACVEs conducted their own evaluation of the state vocational programs, although almost one-third contracted for some kind of outside assistance. Almost one-half of the states indicated that they used data presented in the Annual Accountability Report as the basis for evaluation.

Item number two indicates that most SACVEs reviewed program evaluations conducted by state agencies. Five states had participated in developing the instrumentation. Slightly over half of the SACVEs reported that they had served as members of evaluation teams, and nearly half made specific comments on the evaluation sections of the 1978 Accountability Reports. Well over half made specific recommendations to the State Board regarding the evaluation of vocational education programs.

Many councils found it very difficult to conduct an adequate evaluation of the distribution of federal funds. Only a small percentage of SACVEs met this requirement. They were quick to point out, however, that they were seldom able to obtain data on the actual distribution of federal funds to prepare this report. This was due to differences in reporting schedules. SACVEs are required to report by the end of December, whereas Accountability Reports are not due until six months later. Almost half of the SACVE reports made recommendations to the State Board regarding the distribution of VEA funds.

Item number four indicates that SACVEs often made comments or recommendations relevant to the issues this study investigated. More than half the councils made recommendations on each of the five topics.

2.1 Discussion of Findings

This review of state plans and reports demonstrates a high degree of compliance with the Regulations. Where state agencies did not comply, there appears to be adequate explanation for their shortcomings. In some cases of noncompliance, the law or the Regulations are not easy to understand. In other instances, the Regulations or law have asked the agency to utilize nonexisting documents to prepare their reports. In the case of presenting data which had not previously been required, states must have adequate lead time to develop data collection and reporting procedures.

Table B.1

Compliance with Regulations Concerning the Development of the 5 Year State Plan -- Regulations 104.161-104.165

The Five Year Plan contains evidence of	Yes	No	Can Not Determine
1) Four required meetings of representatives of the State Plan or 107 Committee	25	7	1
2) Sign-off by all members of the State Plan or 107 Committee	26	5	2
3) Convening of public hearings on Plan	30	1	2
4) Inclusion of views expressed at the hearings and reasons for rejecting any of these views	25	5	3
5) Certification by State Attorney General that the State Board is the sole State Agency	25	5	3

Table B.2

Compliance with Regulations Concerning the

Contents of 5 Year State Plans -- Regulation 104.182

The Five Year Plan contains:	Yes	No	Can Not Determine
1) Description of what is required in the local application	30	2	1
2) Definitions of economically depressed areas, areas with high rates of unemployment	29	1	3
3) Identification of new and emergins occupations	16	16	1
4) Description of how funds will be made available to approved eligible recipients	29	3	1
5) Description of mechanisms for coordination of each handicapped child's IEP with vocational program for that child	17	12	4
6) An assessment of current and future job needs of the State (demand data)	31	1	1
7) Inclusion of all data sources (these should be noted in the comments section)	30	3	0
8) Inclusion of dates of data utilized in the plan	24	6	3
9) Evidence of any data supplied by the SOICC	2	28	3

Table B.3

Compliance with Regulations Concerning

Goals to Meet Employment Needs -- Regulation 104.184

State Plan contains:	Yes	No	Can Not Determine
1) A clear description of the goals the State hopes to achieve in meeting the need for workers described in Section III	20	10	3
2) Translation of vocational programs and employement demand data into 6 digit OE codes	31	2	0
3) Description which shows projected enrollments by secondary, post-secondary and adult levels of education	28	3	2
4) Description which shows projected enrollments by institution type (e.g., comprehensive high schools, area vocational schools, etc.)	10	20	3
5) Description which shows funds allocation by secondary, post-secondary and adult levels of education	28	3	2
6) Description which shows funds allocation by institution type (e.g., comprehensive high schools, area vocational schools, etc.)	14	17	2

Table B.4

Compliance with Regulations Concerning

Funding to Meet Employment Needs -- Regulation 104.185

Five Year Plan includes a description of:	Yes	No	Can Not Determine
1) How federal, state and local funds will be used to meet goals	30	2	1
2) Includes intended expenditures for			
-State Administration	28	2	3
-Local Administration	23	9	1
3) Includes reasons for choosing the particular used of funds	24	8	1

Table B.5

Compliance with Regulations Concerning

Funding to Meet Program (Purpose) Needs -- Regulation 104.186

		Yes	No	Can Not Determine
1)	State Plan sets forth the precise use of funds for:			
	A. Basic Grant (Subpart 2)	30	2	1
	B. Program Improvement and Support Services (Subpart 3)	28	4	1
	C. Special Programs for the Disadvantaged (Subpart 4)	29	3	1
	D. Consumer and Homemakind Education (Subpart 5)	23	7	3
	E. 10% Handicapped Set-aside	24	6	3
	F. 20% Disadvantaged Set-aside			
	G. Persons with Limited English Speaking Ability	17	12	4
2)	State Plan shows how State and local funds will be used for matching requirements	23	8	2

Table B.6

Compliance with Regulations Concerning

Policies for Eradicating Sex Discrimination -- Regulation 104.187

The Plan Contains:	Yes	No	Can Not Determine
1) Explanations of actions taken to overcome sex discrimination and stereotyping including:			
-stated relationship of activities of SEC to State sex equity goals	15	15	3
-objectives of these activities stated in measurable terms	17	15	1
-encouragement of both sexes to enroll in non-traditional programs	22	9	2
-model programs to overcome sex bias and discrimination	17	10	6

Table B.7

Compliance with Regulations Concerning
Coordination of Vocational Education and CETA Programs --
Regulation 104.188

The Plan describes:	Yes	No	Can Not Determine
1) Mechanisms established for coordination between vocational education and CETA	27	6	0
2) The criteria developed to avoid duplication of programs between CETA and vocational education	14	15	4

Table B.8

Compliance with Regulations Concerning

the Contents of the Annual Plan -- Regulations 104.205 and 104.222

The Annual Plan contains evidence of:	Yes	No	Can Not Determine
1) Three required meetings of the representatives of the State Plan or 107 Committee	25	9	4
2) All sign-offs required for Plan approval	30	8	0
3) Convening of Public Hearings on the Annual Plan	33	5	0
4) Updating of the Five Year Plan to reflect			
-more accurate employment data	26	10	2
-a different level of funding than originally anticipated	19	19	0
5) A description of how the proposed uses of funds described in the Five Year Plan will be either the same or changed	33	5	0
6) A description of how the set-asides, matching and maintenance of effort provisions will be complied with	27	11	0
7) The results of:			
a) Coordination between manpower agencies and vocational education	32	6	0
b) Compliance with the equal access provisions for both men and women	31	7	0
c) Participation of Local Advisory Councils in Plan	30	8	0

Table B.9

Compliance with Regulations Concerning

the Contents of the 1978 Accountability Report -- Regulation 104.241

The Accountability Report shall contain evidence of:	Yes	No	Can Not Determine
1) The extent to which the state has achieved its goals in measurable terms	27	4	0
2) The degree to which federal, state and local funds have complied with estimates of the state annual plan	29	2	0
3) Details of how funds met the set-asides, matching and maintenance of effort provisions	19	12	0
4) How funds were distributed to local agencies	26	5	0
5) Evaluations of vocational programs conducted by State	26	5	0
6) The use to which these evaluation results were put	24	7	0
7) Consideration given to recommendations made in evaluation report of the State Advisory Council	26	5	0

Table B.10

Compliance with Regulations Concerning
the Contents of SACVE Report -- Regulation 104.97

The SACVE Annual Evaluation Report contains:	Yes	No	Can Not Determine
1) The results of the evaluation of the effectiveness of programs, services and activities.			
Review criteria:			
-Does the SACVE conduct evaluations by its own staff?	22	9	0
-Does it contract with outside agencies for evaluations?	10	21	0
-Does it use the Accountability Report as a basis for maing judgments on program effectivess?	15	16	0
2) A review of the program evaluation results conducted by the State under the authority of 104.401			
Review criteria:			
-SACVE participated in developing the evaluation instrument	5	26	0
-SACVE members are part of evaluation teams	17	14	0
-SACVE makes specific comments on evaluation results reported in 1978 Accountability Report	15	16	0
-SACVE makes recommendations on how evaluations should be conducted or how the instruments used for evaluating programs developed	18	13	0
3) A review of the analysis of the distribution of Federal funds within the State			
Review Criteria:			
-Does the report note the results for any funding formula changes in the 1978 Accountability Report?	6	25	0
-Does the SACVE recommend any changes in the formula?	7	24	0
-Does the SACVE note any problems with the distribution of Federal vocational eudcaion funds?	15	16	0

Table B.10 Continued

4) Recommended changes in programs, services and activities as may be considered necessary			
Changes are recommended in the following areas			
-Planning	25	6	0
-Evaluation	18	13	0
-Funds Distribution	19	12	0
-Special Populations	20	11	0
-CETA/Coordination	18	13	0